

7/11/03-01101

TRANSMITTAL

**To:** LANTNAVFACENGCOM  
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6500 Hampton Blvd.  
Norfolk, VA 23511

**From:** Ben Francisco

**Attn:** Ms. Winoma Johnson Code: EV22WJ

**Date:** July 11, 2003

**Re:** Response to USEPA and VADEQ Comments on the SWMU 14 RI

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Remarks:

Copy To: Mary Cooke, USEPA  
Todd Richardson, USEPA  
Devlin Harris, VDEQ  
Channing Blackwell, CNRMA  
~~Bonnie Capito, LANTDIV~~

## Response to USEPA Comments on the SWMU 14 Draft Remedial Investigation

TO: Winoma Johnson/LANTDIV

COPIES: Todd Richardson/USEPA  
Mary Cook/USEPA  
Devlin Harris/DEQ  
Channing Blackwell/CNRMA

FROM: Holly Rosnick/CH2M HILL

DATE: July 11, 2003

Below is the response to USEPA comments on the *Draft Remedial Investigation SWMU 14, Q-50 Satellite Accumulation Area, Naval Station Norfolk*. The responses to the comments have been incorporated in the revised draft RI report.

### Specific Comments from the Biological Technical Assistance Group (BTAG)

1. In the discussions of the nature and extent of contamination in both the Executive Summary and the body of the report, all relevant criteria or benchmarks, notably ecologically relevant values, should be considered not just human health RBCs. Exceedances of ecologically relevant values should also be identified in the data summary tables.

**RESPONSE:** The report will be revised to compare detected concentrations to ecologically based values also.

2. It is incorrectly noted in Section 1.3.1 that the USEPA Region III Biological Technical Assistance Group screening values are regulatory screening criteria. Section 3.3.1.4 more accurately describes the basis of these values.

**RESPONSE:** The text will be revised accordingly.

3. In Section 6.1.1, Objectives, it is noted that at the conclusion of Step 3 a possible decision point is to take remedial action if the "potential risks could best be addressed through remedial action (e.g., presumptive remedy) rather than additional study." It should be noted that additional study does not address potential risk, but may be necessary to better define the risk to help support a remedial decision.

**RESPONSE:** The text in this bullet will be revised by removing the portion which states "rather than additional study".

4. In Section 6.4.1, Refinement of Conservative Screening Assumptions, it is noted that COPCs were eliminated based on the frequency of detection. It is not appropriate to eliminate COPCs on this basis alone. The spatial distribution of the contaminants and

the representativeness of the sample locations must be considered in conjunction with the frequency of detection parameter.

**RESPONSE:** The specified factors will be added to the text and considered in the evaluation. However, as discussed in the uncertainty section, this criterion was rarely used and had minimal effect on the assessment.

**Specific Comments from the USEPA Toxicologist**

1. Table 2.2. The report indicates a maximum of 46 surface soil samples were collected. However, the analytical results for surface soil (Table F-1-1) report indicates a total of 47 surface soil samples. Duplicate samples were identified at station locations NBW14-DS49 and NBW14-DS54. Please identify any additional duplicate samples?

**RESPONSE:**

2. Table 7.5RME. Please explain why the individual inhalation carcinogenic risk for the adult and child resident is not included in the report?

**RESPONSE:** The carcinogenic risks for the adult and child resident were not calculated individually, however, the lifetime resident risk was calculated.

3. Table 2.4RME. An incorrect RfD is report for Aroclor-1254. The correct value is 5E-05. However, the error does not change the reported risk value.

**RESPONSE:** The oral RfD of 2E-5 is the value that is available in IRIS for Aroclor-1254. The RfD in the risk assessment will be consistent with the IRIS published value unless EPA has additional information that would recommend differently.

4. Table 7.29RME. The risk results cannot be duplicated. Please recheck the final risk values.

**RESPONSE:** The calculations will be checked and corrected where warranted.

5. Table 7.29, 7.29a, 7.30, 7.31, 7.31a.RME. Please explain how Daevent and risk were calculated for 2-methylnaphthalene, 2-methylphenol, 4-methylphenol, acenaphthene, dibenzofuran, and flourene when there are no report values for t\*, Beta, and Tau?

**RESPONSE:** As indicated in Tables 7.29b.RME Supplement, 7.30b.RME Supplement, and 7.31b.RME Supplement, the t\*, Beta and Tau were calculated per equations in the Dermal guidance document.

6. Table 7.32RME Supplement. 1,4-dichlorobenzene is reported twice on the worksheet.

**RESPONSE:** The table will be revised accordingly.

7. Table 8.5RME. Please explain why the individual inhalation carcinogenic risk for the adult and child resident is not included in the report?

**RESPONSE:** The carcinogenic risks for the adult and child resident were not calculated individually, however, the lifetime resident risk was calculated.

8. Table 9.6RME, Inhalation of Shallow Groundwater – Water Vapors at Showerhead, Adult/Child Resident. The table incorrectly provides inhalation risk results for the adult

resident only. Since this receptor is the Adult/Child resident, these risk results should not be provided in this column.

**RESPONSE:** The child resident is considered to bath and the adult resident is considered to take a shower. The inhalation during showering is considered to be a higher risk for the resident than the bath scenario. Therefore, in order to evaluate all uptake scenarios for the age-adjusted resident, the adult inhalation risk was included in the sum for the age-adjusted resident.