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U S EPA REGION III RESPONSES TO THE U S NAVY RESPONSE TO COMMENTS ON THE SITE 8 REMEDIAL INVESTIGATION/ FEASIBILITY STUDY NAWC WARMINSTER PA
07/23/1999
U S EPA REGION III PHILADELPHIA PA

155-3

# EPA FEEDBACK ON TETRATECH RESPONSES TO EPA SITE 8 RIFS COMMENTS

7/23/99

## 1.3.3 Previous Response Actions

It is indicated that "...the final report may include the 1988 aerial photo, although it is of poor quality..." and that "...if necessary, an existing figure in the report will be revised to show the estimated area where this material was disposed". It is suggested that 1988 photo be used with the best quality possible rather than an interpretation of the figure. If the reader is interested, they may ask to review the actual print. As originally suggested, it is more accurate to refer to the areas of interest as "...unvegetated areas where the material may have been deposited ..." rather than "...the estimated area of where this material was disposed."

It is indicated that "...Figure 1-3 shows the location of the groundwater transfer piping..." While this figure shows the estimated location of the piping, it does not show the areal extent of soil removed during the installation of the piping. To meeting OSHA safety requirements, the excavation was configured in a step-like fashion when observed in cross section, with the full width of the excavation substantially greater than 4 feet (see attached Figure 1). In addition, while the trench was 5 feet in depth where the pipe was laid, the depth of soil excavation to either side of the pipe was only one to two feet. As requested, site records should be reviewed to identify the actual excavation dimensions and identified in the report.. The significance of this information is that certain soils from this excavation area which received runoff from the fire training area and likely to be part of the soils in the soil pile by the runway.

If the soil pile may still be in place at the time the Proposed Plan and RI report are released for public comment, these documents should be accurate and acknowledge the existence of the pile and indicate that part of this soil may been excavated from areas which received runoff from the runway. The Plan can indicate that the Navy plans to remove the pile in the near future with the disposition dependent on the results of testing to be performed. If soil pile is still in place or be backfilled in the vicinity of Site 8 at the time the ROD is to be signed, this should be acknowledged in the ROD and analytical results indicating the soil does not present an unacceptable risk should be included in the Administrative Record supporting the ROD.

It is indicated that during the excavation activities associated with the transfer line that there were no soils with a petroleum odor within 200 feet of the site. It is not clear what is meant by "site". More information should be provided to confirm that the soil of interest was not excavated from an area which may have been impacted by fire training activities.

## 1.4 SUMMARY OF PREVIOUS INVESTIGATION

In addition to noting that the holes appear to be associated with Structure S1 and/or activities in the area of S1, it is notable that some of the holes are at least several feet in diameter. It is suggested that the material accumulated in these holes be addressed concurrently with the soil pile at the end of the runway prior to the ROD issuance.

### 2.2.6 Surface Soil Sampling and Analysis

It is indicated that the "Navy does not believe it is necessary to include the actual depth of each surface soil sample in the appendix." This information should be included to indicate that a substantial number of soil samples were collected at 1.5' to 2' in depth, a depth which could be considered shallow subsurface soils. This information indicates that subsurface samples are not necessarily limited to soils relatively close to bedrock.

### 6.4 HHRA CONCLUSIONS

The referenced carcinogenic risk numbers which are indicated as being incorrect were obtained from Tables 6-66 and 6-70 of the RI report. Table 6-83, which summarizes all of calculated risks, includes different risks for the same exposure pathways. These are likely those that are considered to be "correct". The results appear to be different due to differences in rounding of figures in calculations, where the results in Table 6-83 are more accurate. Our final comments on the RI (see letter of July 19, 1999) actually recommend that the results in Table 6-83 ( 2.26 E-05 and 2.94E-05, respectively) be used. These results should be identified in the text of this section as well as the executive summary.

### 2.2.6 Surface Soil Sampling and Analysis and
### 2.2.7 Subsurface Soil Sampling Analysis

The comment responses by Tetratech appear to address a final draft of EPA comments that were emailed to the Navy on July 12. As you are aware, final comments are dated July 19. These comments are effectively the same as those of July 12 in substance with two possible exceptions which apply to these sections. The subject comments simply suggest that it be indicated that neither surface nor subsurface soil samples contained soils which appeared to be have been impacted by fire-training activities.

### ADDITIONAL NOTE

Upon further review of Figure 1-3 in the RI, I believe this figure should be modified to improve accuracy. I plan to submit comments to you in this regard very shortly.