

N60138.AR.003011  
FISC WILLIAMSBURG  
5090.3a

LETTER AND COMMENTS FROM U S EPA REGION III REGARDING DRAFT SITE  
INSPECTION REPORT SITE 7 OLD DUPONT DISPOSAL AREA FISC WILLIAMSBURG VA  
4/26/2012  
U S EPA REGION III



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

April 26, 2012

Mr. Scott Park  
NAVFAC MIDLANT, Building N-26  
Hampton Roads Restoration Product Line, Code OPHREV4  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Subject: Draft Site Inspection Report for Site 7-Old DuPont Disposal Area. September 2011.

Mr. Park:

Thank you for the opportunity to review the subject document. EPA would like to provide the following comments at this time.

1. The last part of BTAG Comment 1 stated that Table 3-5 in the decision summary indicates that seven contaminants (endrin, arsenic, lead, manganese, mercury, selenium, and thallium) had concentrations that exceeded background and ecological criteria. The conclusion is that an expanded site inspection (SI) would be completed to confirm selenium and thallium concentrations. BTAG stated that the report needed to explain why concentrations of the other five contaminants listed above do not need to be confirmed in the expanded SI. The response to comments (RTC) does not address this comment.
2. The response to BTAG Comment 2 indicates Figure 3-1 (Historical Conceptual Site Model) will be revised to show the soil sample locations collected in 2004. Upon further review of this and other figures, the eastern site boundary on the two conceptual site model figures (3-1 and 3-3) do not appear to match up with the eastern site boundaries shown on Figures 3-2, 3-4, 3-5, and 3-6. It would be helpful to show the lobe of waste/debris on the conceptual site model Figure 3-1 on all the other figures with sample locations and site boundaries.
3. The response to BTAG Comment 9 restates the original logic used in the report to eliminate an explosive with no marine surface water screening value. While the original logic is one way to address the issue, it leads to uncertainty. Another approach would be

to state there is no marine screening value for nitroglycerin, and while the maximum detected value of this compound is below the freshwater screening value, there is no way to compare it to the marine value for this compound. While uncertainty would still exist, the conclusion, it is not reasonable to screen out nitroglycerin, would be reasonable and more conservative.

4. BTAG Comment 14 stated that the confirmation sampling results and backfill contaminant concentrations need to be compared to screening values for terrestrial receptors (e.g., plants, invertebrates, birds, and mammals) to ensure that risk is not still present at this site. The RTC states that since the backfill material was certified clean by the removal action contractor, analytical data certifying that the backfill material was clean was not compared to screening criteria or evaluated in the SI. It would be helpful if information were provided indicating how the removal contractor certified that the backfill was clean.

If you have any questions, please contact me at 215-814-3378.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Burchette', is centered on the page. The signature is fluid and cursive, with a large initial 'J' and a long, sweeping underline.

John Burchette  
Remedial Project Manager

cc: Wade Smith, VDEQ