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Ms. Cheryl L. Deskins, Director
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Indian Head Division
Naval Surface Warfare Center
101 Strauss Avenue
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April 4, 2000

REF: Remedial Investigation Report for IR Site 57, Former Drum Disposal Area, Building 292, February, 2000

Dear Ms. Deskins:

Enclosed are my comments relative to the above referenced RI report.

I would like to know the extent of any peer professional or technical review that has been elicited. Specifically, was a copy of the report submitted to any Maryland State agency such as the State Department of Health and Mental Hygiene and/or the Environmental Protection Agency's Center for Desease Control in Atlanta?

The report is very thorough and detailed and should be an excellent tool for NSWC in its program of risk assessment.

My apology for the delay in getting my comments to you. Call me if you have any questions.

Sincerely,

Elmer S. Biles
301 283 6298

Comments on Remedial Investigation Report for IR Site 57, Former Drum Disposal Area, Building 292, submitted by Tetra Tech NUS, Inc.-February, 2000, Elmer S. Biles, RAB, April 4, 2000

1. Executive Summary--This section as well as comments elsewhere in the report make reference to types of risks associated with various classifications of individuals (e.g. construction workers, lifelong residents, child residents, etc.). No where, however, could I find any complete list and/or definition of the range of classifications that were considered. Such a list should be included somewhere in the report. Are there any intermediate classifications of individuals between construction worker and a lifelong resident? As I have mentioned before (see my letter of April 23, 1999 to Ms. Susan Adams) "any evaluation could be affected by either a change in the level of operation of the facility, a change in the mission of the facility or a totally new use of the facility other than for military support."

2.The first and third bullets on page ES-3 require some clarification. Is bullet one included because of the detection of arsenic or due to trichloroethene (TCE) or both? See 11.3 Summary of Human Health Risk Assessment 7). This paragraph indicates that "the hazard indices for a construction worker exposed to surface/subsurface soil, groundwater, sediment, and surface water in the downgradient area exceed 1.0 for the RME scenario. Incidental ingestion of arsenic in surface/subsurface soil was the main contributor to the hazard index." Yet under paragraph 10.5.2.2 Arsenic--The author suggests for reasons given that "arsenic should be dropped from further consideration for Site 57." Does this refer only to arsenic as an ecological risk? The report further states in paragraph 11.5 "soil contamination is the major reason the hazard index for construction exceeds the acceptable level of 1.0. It is recommended that a feasibility study be initiated to evaluate potential alternatives for mitigating the potential risk to construction workers due to soil contamination."

The reader is left wondering if it is being proposed that the presence of arsenic should no longer be considered in any future studies at site 57 why are feasibility studies being recommended to evaluate potential alternatives for mitigation? Is the recommendation for mitigation due primarily to the detection of trichloroethene (TCE)? As stated above the explanation for the proposed mitigation in bullet one and bullet three on ES-3 should be clarified.

3, Figure P-2 in Volume II Appendices suggests rather high levels of TCE were observed at storm sewer MH-02 (MH-431) and MH 497.in July 1994 but no data are included to confirm this.

4. Based on the current operating level of the facility one could conclude from the data presented in the Remedial Investigation Report that the only health risks are to construction workers at the site. Is this a correct conclusion? What steps will management take to safeguard "construction workers" ? What is the difference if any between the exposure that may be experienced by a construction worker and any other employees assigned on a regular basis to building #292?

5. I would again like to stress the need for management at the NSWC to address the timely implementation of the recommendations proposed from this and any Remedial Investigation Report that may be generated relative to the numerous contamination sites on the facility. In addition management and the RAB have a responsibility to address any potential health risks (past, current and future) that any employee may have sustained as a result of exposure to identified contaminates. We should identify those employees who may have had sustained exposure and make them aware of any potential health risks. Failure to act responsibly in this regard could open management to claims of suppression of health related information that could be damaging to the health and welfare of its employees and to employee relations in general.

In my letter of April 23, 1999 to Ms. Adams I asked a series of specific questions and recommendations relating to the dissemination of information to employees. Has any action been taken in this regard? I believe it is important that management act timely and decisively on these issues.