

RESPONSES TO COMMENTS – SEPTEMBER 26, 2001
DRAFT FINAL RECORD OF DECISION – SITE 44, SOAK OUT AREA (May 2001)
IHDIV-NSWC, INDIAN HEAD, MARYLAND

COMMENTS FROM JEFF MORRIS, EFACHES – May 30, 2001

1. **General:** In general, whole numbers ten and less should be spelled out in the text.

Response: Agree. Such numbers will be spelled out, unless accompanied by units of measure (e.g., 2 years), as per the TtNUS Style Guide for the CLEAN contracts.

2. **Section 1.2, Statement of Basis and Purpose:** I don't think EPA should be mentioned as concurring as they are signing the ROD.

Response: This was not changed. EPA legal review had no problems with the language.

3. **Section 1.7, Authorizing Signature:** The Indian Head CO should sign this, according to OPNAVINST 5090.

Response: Marc A. Siedband, Captain, U.S. Navy will be added.

4. **Section 2.1, Site Name, Location, and Description:** Is the EPA identification number mentioned in the first paragraph the proper number (i.e., CERCLIS) or should we be using another number, such as the NPL Docket number?

Response: EPA ROD guidance states that the CERCLIS number should be used. No revision required.

5. **Section 2.3, Community Participation:** This section should mention the RAB. Also, the ROD Checklist says the section should "describe efforts to solicit views on the reasonably anticipated future land uses and potential future beneficial uses of ground water."

Response: The following paragraph will be added to this section: "A Restoration Advisory Board (RAB) made up of community members and Navy, federal, and state officials meets several times a year. The RAB is designed as a focal point for the exchange of information between IHDIV-NSWC and the local community regarding restoration activities." The second part of the comment is not applicable because the community and the RAB have no input on land and groundwater use at IHDIV-NSWC.

COMMENTS FROM CURTIS DETORE, MDE – June 4, 2001 (telephone conversation)

1. **Page 2-12, Section 2.8, second sentence:** Change “with the support of EPA” to “with the support of EPA and MDE.”

Response: This sentence will be revised.

2. **Page 2-12, Section 2.8, last sentence:** Change “Navy and EPA” to “Navy, EPA, and MDE.”

Response: This sentence will be revised.

COMMENT FROM CURTIS DETORE, MDE – June 7, 2001 (telephone conversation)

1. **Page 2-3, first paragraph, last sentence:** Remove the number “47” because the quantity of IR sites may change in the future.

Response: This sentence will be revised.

COMMENT FROM RICHARD DALE, IHDIV-NSWC – June 29, 2001 (e-mail)

1. **General:** I note we don't mention/cite OPNAVINST 5090.1b (including Section 15-3.10 which specifically provided for NFRAP designation) anywhere in the document. Is this by omission or intentional?

Response: Based on subsequent e-mail with IHIRT, no revisions are necessary. IHIRT members made the following statements:

- There is no mention of OPNAVINST 5090.1b in EPA ROD guidance (which was followed to prepare the ROD). Since the IR program follows CERCLA, and the reference to CERCLA was made in the ROD, the reference to OPNAVINST 5090.1b wasn't required. Therefore, it wasn't included in the document.
- CERCLA drives this process. 5090.1b references CERCLA, rather than the other way around.

COMMENTS FROM EPA ATTORNEY – September 20, 2001

1. **Page 2-1, Section 2.1.1, fifth line:** What is mercaptan?

Response: Mercaptans are a group of organic compounds. They are liquids having a very strong odor. No revision required.

2. **Page 2-3, Section 2.5.1, second paragraph:** The first sentence mentions “installation of five soil borings.” Is this how these are commonly discussed? It seems like it should be the extraction of soil borings.

Response: This is common terminology. However, the word “installation” will be replaced with “drilling.”

3. **Page 2-4, first full paragraph:** In the fourth line, delete the phrase “for completeness and.” Stating that use of shallow groundwater is not a reasonable future land use does not impact the statutory requirements to clean groundwater to MCLs.

Response: The deletion will be made. Chemical concentrations in groundwater do not exceed MCLs.

4. **Page 2-5, first paragraph, last sentence:** How useful a yardstick is the basewide background concentrations when the base is rife with sites that require cleaning?

Response: The background report was issued in 1997. Every effort was taken to ensure that the background samples were collected from relatively pristine, undisturbed areas not influenced by SWMUs or AOCs.

5. **Page 2-6, Section 2.5.5, first paragraph:** In the third line, delete the phrase “and for the purpose of completeness.” The statement that groundwater is not used as a potable water supply is not dispositive as to the issue of whether cleanup is necessary. The fact, stated on the previous page, that there is no exceedances of MCLs is.

Response: The phrase concerning completeness and the sentence on groundwater use will be deleted.

6. **Page 2-6, Section 2.6, last paragraph:** In the second line, delete the phrase “for purposes of completeness and.”

Response: This phrase will be deleted.

7. **Page 2-8, first paragraph:** In the fifth line, delete the phrase “for purposes of completeness and.”

Response: This phrase will be deleted.

8. **Page 2-9, following risk equation:** Is there anywhere to define the term “slope factor” for the lay person?

Response: The EPA definition of slope factor is complicated and not in layperson’s terms. The term “(cancer potency factor)” will be inserted following slope factor.

9. **Page 2-10, last bullet under Carcinogenic Risks:** Is the lifetime resident a child or an adult?

Response: The lifetime receptor is a child (6 years) and an adult (24 years).

10. **Page 2-11, first sentence:** Change “presented for informational purposes and” to “analyzed.”

Response: This sentence will be revised.

11. **Figure 2-3:** The symbol for 44SB02 is not in the legend.

Response: The symbol will be corrected on all figures that show sampling locations. It is a historical subsurface soil sample.

12. **Figure 2-5:** Would sample S44SS002, collected from the other side of the drainage ditch really be site-related? What do the letters following some of the sample results stand for?

Response: This sample was collected to determine if contaminants had migrated from the Soak Out Area. The letters are data validation qualifiers. These will be added to the legend on all appropriate figures.

13. **Figure 2-7:** Are the groundwater results presented only from 1997?

Responses: Yes. Although groundwater samples were also collected in 1992 and 1993, the 1997 results are the most representative of current site conditions (as stated on page 2-5 where this figure is referenced). The figure will be revised to indicate the results are from 1997.

14. **Page A-2, Contaminant:** Change "high enough concentration" to "certain threshold concentration."

Response: This definition will be revised.

15. **Page A-2, Information Repository:** Change "and made available" to "that is made available."

Response: This definition will be revised.

16. **Page A-3, Record of Decision:** Change "that explains which clean-up alternative(s) will be used" to "that selects the clean-up alternative(s) which will be used."

Response: This definition will be revised.

17. **Page A-4, Secondary Drinking Water Standards:** Is this term referenced in the document?

Response: This term was not referenced in the ROD, and it will be deleted from the glossary.