# Proposed Plan

# Site 13, Paint Solvents Disposal Ground

## U.S. Navy Announces the Site 13 Proposed Plan

**Naval District Washington, Indian Head**
**Indian Head, Maryland**

May 2004

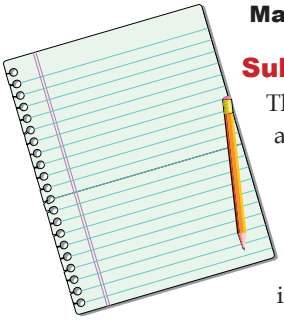
## Introduction

This **Proposed Plan** recommends that no further action be taken to address the Paint Solvents Disposal Ground (Site 13) at Naval District Washington, Indian Head (NDWIH) in Indian Head, Maryland. The Plan provides the rationale for this recommendation, based on the investigative activities performed at Site 13 to date, and explains how the public can participate in the decision-making process. The location of the NDWIH and Site 13 are shown on Figure 1.

The Department of the Navy (Navy) (the lead agency for the site activities) and the U. S. Environmental Protection Agency Region III (EPA) (support agency), in consultation with the Maryland Department of the Environment (MDE) (support agency) issue this document as part of the public participation responsibilities under Title 40 of the Code of Federal Regulations (CFR), Section 300.430(f)(2). Title 40 CFR 300 is known as the **National Oil and Hazardous Substances Pollution Contingency Plan (NCP)**. This Proposed Plan summarizes information that can be found in greater detail in the **Remedial Investigation (RI)** report and other documents contained in the **Administrative Record File** for this site.

The Navy and EPA, in consultation with MDE, will make a final decision on the **response action** for the Site after reviewing and considering all information submitted during the 30-day public **comment period** and may modify the preferred response action or select another action based on any new information or public comments. Therefore, community involvement is critical and the public is encouraged to review and comment on this Proposed Plan. After the public comment period has ended and the comments and information submitted during that time have been reviewed and considered, the Navy and EPA, in consultation with MDE, will document the action selected for the site in a **Record of Decision (ROD)**.

## Mark Your Calendar for the Public Comment Period



### Public Comment Period

**May 28 - June 28, 2004**

### Submit Written Comments

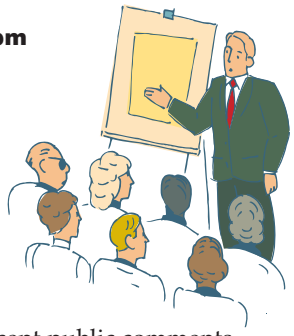
The Navy, EPA, and MDE will accept written comments on the Proposed Plan during the public comment period. To submit comments or obtain further information, please refer to the insert page.

### Attend the Public Meeting

**June 17, 2004, from 5:00 pm to 7:00 pm**

Senior Center
100 Cornwallis Square
Indian Head, MD

The public comment period will include a public meeting during which the Navy, EPA, and MDE will provide an overview of the site, previous investigation findings, remedial alternatives evaluated, and the Preferred Alternative, answer questions, accept public comments.



### Location of Administrative Record

The Administrative Record is available for public viewing at the following location:

Naval District Washington, Indian Head
General Library
Building 620 (The Crossroads)
101 Strauss Avenue, Indian Head, MD

Phone: 301.744.4747

Hours:
M-F 9:00 am - 5:30 pm
Sat/Sun closed

A glossary of specialized terms used in this Proposed Plan is attached. Words included in the glossary are indicated in **bold print** the first time they appear in the plan.

## Site History

Site 13 is an approximately 400-square-foot wooded area adjacent to the west side of Building 870, which was constructed in 1953 and used as a Paint Shop. The building is currently used as an office and tool shop. An asphalt drive surrounds the building. When used as a Paint Shop, various items were painted by hand using aerosol sprays or paint spray booths. According to facility records and interviews with facility personnel, as documented in a 1983 **Initial Assessment Study (IAS)** (Fred C. Hart Associates, Inc., 1983), between 1953 and 1979, approximately 115 gallons per year of kerosene, mineral spirits, lacquer thinners, and solvents may have been deposited in a depressed area located in the woods behind the Paint Shop. It is also estimated that approximately one percent of the 3,380 gallons of paint used annually may have been washed off during paint equipment cleaning operations, which took place over bare soil areas behind Building 870.

## Site Characteristics

Site 13 is at an elevation of approximately 85 to 90 feet above mean sea level. Approximately 50 feet to the south and west of Building 870, on the other side of the asphalt drive, the terrain slopes down into a wooded area. Two drainage swales radiate from the foot of this slope to the northwest and southwest of Building 870. The drainage swales contain water only during storm-runoff events. Figure 2 depicts Site 13 surface features and topography.

Soil underlying the site (down to a depth of 46 feet below ground surface) consists of silty and sandy clays, and sands. The depth to shallow **groundwater**, as determined from the monitoring well installed at the site, is approximately 37 feet below ground surface. It is likely that the general flow direction of the groundwater is to the west because the land gently slopes to the west, and water table configurations generally resemble the surface topography of the land.

The nearest potable water wells are Well 2, located 1,800 feet north, and Well 7, located 1,950 feet southeast of the site. Well 2 was installed in 1902 in the Lower Patapsco aquifer with a depth of 409 feet. The well was abandoned and sealed in 1986. Well 7 was


*Figure 1 - NDWIH, Indian Head, MD*

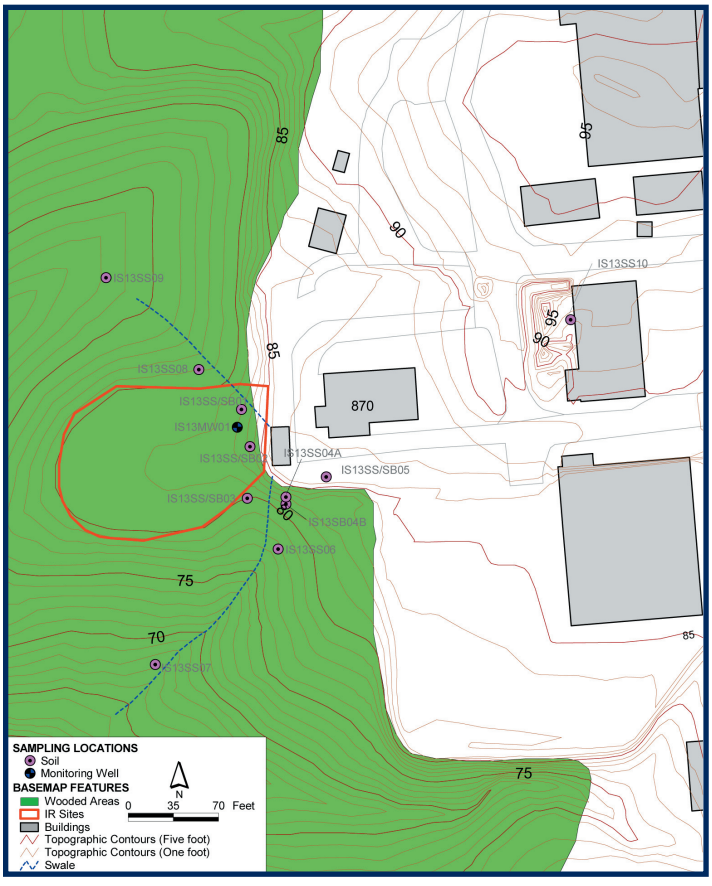



*Figure 2 - Site 13 Map*

drilled in 1915 in the Patapsco aquifer with a depth of 419 feet. It was screened at three depths: 255'- 265', 308'-317', and 377'-399'. Well 7 is active but is slated for abandonment. In general, these potable water wells were installed in deeper aquifers (greater than 400 feet below ground surface) than the water table aquifer (about 37 feet below ground surface) in which the monitoring well was installed. The surrounding land use in the vicinity of Site 13 consists of undeveloped woodland. The site is not currently used for any facility activities.

## Investigation History

Several investigations were conducted at Site 13 between 1983 and 2003. Below is a chronological description of each of these investigations.

#### Initial Assessment Study (IAS)

The objective of the IAS (Fred C. Hart Associates, Inc, 1983) was to identify and assess sites posing a threat to human health or to the environment due to contamination from past hazardous materials operation. The IAS identified Site 13 as a 400-square-foot paint solvent disposal area based on observations of "severe vegetation and foliage stress," and "strong solvent odors in the air" up to 25 feet from the back of Building 870. The IAS concluded that kerosene, mineral spirits, lacquer thinners, and solvents may have been deposited in a 200-square-foot depressed area, approximately 2 feet below grade and 50 feet behind the Paint Spray Building (870).

#### Phase II RCRA Facility Assessment (RFA)

A Phase II RFA (Kearny, A.T., Inc., 1988) was conducted by the EPA and consisted of a Preliminary Review (PR) of available documents and a Visual Site Inspection (VSI), which was conducted July 11-15, 1988.

Site 13 was visited twice during the VSI; but the exact location of the solvent disposal area behind Building 870 identified during the IAS could not be determined. Furthermore, areas of bare or depressed soil were not observed. The only evidence of contamination in the identified area was one rusted and empty 55-gallon drum located in the wooded area south of the shop. Solvent odors near the present waste oil storage pad and stained soil beneath a wooden pallet used for storage of paint cans were noted. The foreman of the maintenance shops and the Paint Shop foreman were interviewed but neither knew of the existence of a paint solvents disposal area.

#### Remedial Investigation (RI)

There was no sampling conducted at this site up to this point. Therefore, surface and subsurface soil sampling was conducted in July 2000 as part of the RI conducted at Site 13 and four other sites (CH2M HILL, 2004). Surface and subsurface soil samples including background samples (i.e., samples collected in areas considered to be uncontaminated) were collected and analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), metals, explosives, and total petroleum hydrocarbons (TPH). Several inorganics, VOCs, and SVOCs were detected in the soil samples. However, comparison of soil analytical results to federal screening levels established to protect groundwater from chemicals leaching from soil indicate that the detected concentrations of chemicals in soil samples were below the screening levels; therefore, the potential for these soils to serve as a source of groundwater contamination was low. Based on this, and the fact that depth to groundwater at the site is more than 30 feet, the Navy determined that the sampling of groundwater was not necessary. The RI recommended no further action for this site.

#### Investigation of Groundwater Flow at Site 13

Following the RI, the EPA and the MDE expressed concern about the level of uncertainty surrounding the determination that former painting activities at Site 13 likely had minimal impact on the underlying groundwater. The regulatory agencies proposed that one monitoring well be installed at the site and sampled for low concentration VOCs.

Monitoring well IS13MW01 was installed in a location within the proposed site that would represent an area close to the Paint Shop and where solvents possibly could have been disposed. The well was installed in December 2002 and was sampled in January 2003. One VOC, toluene, was detected at an estimated concentration of 0.32 micrograms per liter (µg/L). EPA Region III's **Risk-Based Concentration (RBC)** for toluene in tap water (October 9, 2002) is 75 µg/L and the Federal **Maximum Contaminant Level (MCL)** for toluene (November 2000) is 1,000 µg/L. Neither of these criteria for toluene were exceeded in the groundwater sample. A more detailed discussion of the data is provided in the technical memorandum *Investigation of Groundwater Flow at Site 13, Indian Head Division-NSWC, Indian Head, Maryland* (CH2M HILL, 2003).

The analytical results of this investigation confirmed the conclusions stated in the RI report that operations at Building 870 have not impacted groundwater and have only minimally impacted soil. The analytical results support the recommendation of no further action proposed for this site in the RI.

## Principal Threats

There are no principal threats in any of the media at Site 13. Principal threats are explained in the box on the this page.

## Scope And Role Of The Action

This Proposed Plan addresses the evaluation of the preferred alternative for Site 13 only. It does not include or directly impact any other sites at the facility.

The purpose of the Proposed Plan is to summarize activities performed to date to investigate Site 13 and provide a rationale for the proposed response action, which in this case is no further action. As described in the following sections, no human health or ecological risks that require further action at this site were identified.

## Summary Of Site Risks

This section presents an overview of the risks associated with the current and future land uses of Site 13. A detailed discussion of risks at Site 13 and the risk evaluation process can be found in the *Final Remedial Investigation Report, Sites 11, 13, 17, 21, and 25, Naval District Washington Indian Head, Indian Head, Maryland* (CH2M HILL, 2004).

To summarize, the potential risk to people, plants, and animals from existing chemicals in Site 13 soil is low. It does not appear that exposure to site soil would result in significant human health or ecological risks at Site 13. In addition, there appears to be no risk of contaminating the underlying groundwater.

### Human Health Risks from Soil

A baseline human health risk assessment was performed for soil at Site 13 to determine the current and future effects of contaminants in soil on human health. The receptors evaluated in the risk assessment for both current and future uses included:

- For current uses - adolescent and adult trespassers/visitors.
- For future uses - adult and child residents, adult and adolescent trespassers/visitors, industrial workers, and construction workers.

The Navy evaluated the residential exposure scenario to confirm that no land use restrictions would be necessary at the site. The site is currently undeveloped woodland within an industrial area and there are no other current or projected future land uses of the site.

Chemicals of potential concern (COPCs) were identified during the investigation and calculation of risk estimates for human receptors. The COPCs were aluminum, arsenic, chromium, iron, and manganese for the current and future uses of soil. However, the baseline risk assessment subsequently determined that under current conditions, soil does not present an unacceptable risk. The h**azard index (HI)** was below one for all receptors and the calculated cancer risk is at the lowest end of the EPA's acceptable target risk range of $10^{-4}$ to $10^{-6}$. For an explanation of the human health risk assessment process, see the text box on page 5.

The highest HI calculated for the soil under current conditions is 0.05 for the adolescent trespasser/visitor scenario and the cancer risk is $1x10^{-6}$ for the adult trespasser/visitor scenario. The highest HI calculated for soil under potential future conditions is 1.8 for the child resident scenario, which is above the EPA benchmark. However, when the HI was calculated individually for each of the organs that are affected by these metals, none exceeded one. The calculated HI for the future adult resident is less than the EPA benchmark. The calculated cancer risk of $3.6x10^{-5}$ to a future lifetime resident of the site is within the EPA's target risk range, which is protective of human health. It should be noted that the future use of this site as a residential area is very unlikely.

In summary, the risk assessment for the future resi-

### What is a "Principal Threat"?

The National Contingency Plan establishes an expectation that EPA will use treatment to address "principal threats" posed by a site wherever practicable [40 CFR Section 300.430 (a)(1)(iii)(A)]. The "principal threat" concept is applied to the characterization of "source materials" at a **Superfund** site. A source material is material that includes or contains hazardous substances, pollutants, or contaminants that act as a reservoir for migration of contamination to groundwater, surface water, or air or acts as a source for direct exposure. Contaminated groundwater generally is not considered to be a source material; however, non-aqueous-phase liquids (NAPLs) in groundwater may be viewed as a source material. Principal threat wastes are those source materials considered to be highly toxic or highly mobile that generally cannot be reliably contained or would present a significant risk to human health or the environment should exposure occur. The decision to treat these wastes is made on a site-specific basis through a detailed analysis of the alternatives using the nine remedy selection criteria. If through this analysis, a treatment remedy is selected, then this selection is reflected in the Record of Decision, which will include a finding that the remedy uses treatment as a principal element.

## What is Human Health Risk and How is it Calculated?

A human health risk assessment estimates "baseline risk." This is an estimate of the likelihood of health problems occurring if no cleanup action were taken at a site. The Navy undertakes a four-step process to estimate baseline risk at a site:

**Step 1: Analyze Contamination**

**Step 2: Estimate Exposure**

**Step 3: Assess Potential Health Dangers**

**Step 4: Characterize Site Risk**

**In Step 1**, the Navy looks at the concentrations of contaminants found at a site as well as past scientific studies on the effects these contaminants have had on people (or animals, when human studies are unavailable). Comparisons between site-specific concentrations and concentrations reported in past studies help the Navy to determine which contaminants are most likely to pose the greatest threat to human health.

**In Step 2**, the Navy considers the different ways that people might be exposed to the contaminants identified in Step 1, the concentrations that people might be exposed to, and the potential frequency and duration of exposure. Using this information, EPA calculates a "reasonable maximum exposure" (RME) scenario that portrays the highest level of human exposure that reasonably could be expected to occur.

**In Step 3**, the Navy uses the information from Step 2, combined with information on the toxicity of each chemical, to assess potential health risks. The Navy considers two types of risk: cancer risk and non-cancer risk. The likelihood of any kind of cancer resulting from a site is generally expressed as an upper-bound probability, for example, a "1 in 10,000 chance." In other words, for every 10,000 people that could be exposed, one extra cancer may occur as a result of exposure to site contaminants. An extra cancer case means that one more person could get cancer than would normally be expected to from all other causes. For non-cancer health effects, the Navy calculates a "hazard index (HI). " The key concept here is that a "threshold level" (measured usually as a hazard index of less than 1) exists below which adverse, non-cancer health effects are no longer predicted.

**In Step 4**, the Navy determines whether site risks are great enough to cause health problems for people at or near the site. The results of the three previous steps are combined, evaluated, and summarized. The Navy adds together the potential risks from the individual contaminants to determine the total risk resulting from the site.

dential scenario indicates that no unacceptable health threats (cancer or non-cancer) are posed to people for exposure to soil at the site. Therefore, it is the Navy's and the EPA's current judgement that no further action is necessary to prevent exposure to contaminants in the soil at Site 13.

### Ecological Risks from Soil

The Navy also conducted an ecological risk assessment (Steps 1-3A) at the site, including an evaluation of the risks to plants and animals. For an explanation of the ecological risk assessment process, see the text box below. Based on the ecological evaluation, chemicals in the soil at the site pose minimal risk to ecological receptors.

The calculated hazards for animals or plants that might be exposed to site chemicals, directly or through the food chain, were within an acceptable range. Four metals (aluminum, chromium, iron, and vanadium) were detected at the site above the screening levels but equivalent to background conditions. While three other metals (lead, mercury, and zinc) were present at concentrations that exceed screening values and background levels, subsequent toxicity evaluations suggest that adverse impact from these metals to plants and animals are unlikely.

## What is Ecological Risk and How is it Calculated?

An ecological risk assessment evaluates the potential adverse effects that human activities have on the plants and animals that make up ecosystems. The ecological risk assessment process follows a phased approach similar to that of the human health risk assessment. The risk assessment results are used to help determine what measures, if any, are necessary to protect plants and animals.

Ecological risk assessment includes three steps:

**Step 1: Problem Formulation**

The problem formulation includes:

- Compiling and reviewing existing information on the site habitat, plants, and animals that are present
- Evaluating how the plants and animals may be exposed
- Identifying and evaluating area(s) where site-related chemicals may be found
- Evaluating potential movement of chemicals in the environment
- Evaluating routes of exposure (for example, ingestion)
- Identifying receptors (plants and animals that could be exposed)
- Identifying exposure media (soil, air, water)
- Developing how the risk will be measured for all complete pathways (determining the risk where plants and/or animals can be exposed to chemicals)

**Step 2: Risk Analysis**

The second step of the ecological risk assessment is risk analysis, in which potential exposures to plants and animals are estimated and the concentrations of chemicals at which an effect may occur are evaluated.

**Step 3: Risk Characterization**

The third step in the ecological risk assessment is risk characterization, in which all of the information identified in the first two steps are used to estimate the risk to plants and animals. Also included is an evaluation of the uncertainties (potential degree of error) that are associated with the predicted risk evaluation and their effects on the conclusions that have been made.

### Groundwater

Human health and ecological risk assessments were not performed for groundwater. Per the EPA's and the MDE's requests, one monitoring well at the site was installed, sampled, and analyzed for volatile organic compounds to assess any potential impact to groundwater. The EPA and the MDE agreed with the Navy's conclusion that the groundwater is not impacted by activities at Building 870.

## Preferred Alternative

The Navy and the EPA, with the support of the MDE, are proposing no further action as the preferred alternative for Site 13. Based on the results of investigations conducted at Site 13, the Navy, the EPA, and the MDE have determined that the site does not pose an unacceptable risk to people, plants, and animals; therefore, no alternative other than the no further action alternative was evaluated. Under this alternative, no response action will be performed at the site; therefore, no institutional controls, remedy schedule, capital cost estimation, or annual operation and maintenance are necessary. The Navy may modify the preferred alternative or select another alternative if public comments or additional data indicate that another alternative will yield a more appropriate result.

## Community Participation

The Navy and the EPA provide information regarding the cleanup of the NDWIH to the public through public meetings, the Administrative Record file for the site, the **information repository**, and announcements published in the newspaper. The Navy and the EPA encourage the public to gain a more comprehensive understanding of the site and the **CERCLA** activities that have been conducted at the site.

The 30-day public comment period is May 28, 2004 through June 28, 2004. The public meeting will be held on June 17, 2004, from 5:00 P.M. to 7:00 P.M. at the Senior Center, 100 Cornwallis Square, Indian Head, Maryland [301-744-4627]. The location of the Administrative Record and Information Repository are also provided on Page 1 of this Proposed Plan.

Minutes of the public meeting will be included in the Administrative Record file. All comments received during the public meeting and comment period will be summarized and responses will be provided in the **Responsiveness Summary** section of the ROD. The ROD is the document that will present the selected remedy and will be included in the Administrative Record file.

Written comments can be submitted via mail, e-mail, or fax and should be sent to the following addressee:

**Ms. Tara Landis, Public Affairs Officer**
Naval District Washington, Indian Head
101 Strauss Avenue, Building 20
Indian Head, MD 20640-5035
Phone: 301-744-4627
FAX: 301-744-6743
Email: LandisTS@ih.navy.mil

For further information, please contact:

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## References

CH2M HILL, 2004. *Final Remedial Investigation Report, Sites 11, 13, 17, 21, and 25, Naval District Washington*, Indian Head, Indian Head, Maryland.

CH2M HILL, 2003. Technical Memorandum. *Investigation of Groundwater Flow at Site 13, Indian Head Division-NSWC*, Indian Head, Maryland.

Fred C. Hart Associates, Inc., 1983. *Initial Assessment Study of Naval Ordnance Station*, Indian Head, Maryland.

Kearney, A.T., Inc., 1988. Phase *II RCRA Facility Assessment of the Naval Ordnance Station*, Indian Head, Maryland.

## Glossary of Terms

**Administrative Record File**: A record made available to the public that includes all information considered and relied on in selecting a remedy for a site.

**CERCLA**: Comprehensive Environmental Response, Compensation, and Liability Act (1980), also known as the Superfund Law, as amended by the Superfund Amendments and Reauthorization Act of 1986. CERCLA provides the authority and procedures for responding to releases of hazardous substances, pollutants, and contaminants from inactive hazardous waste disposal sites.

**Comment Period**: A time for the public to review and comment on various documents and actions taken, either by the Navy, EPA, or MDE. A minimum 30-day comment period is held to allow community members to review the Administrative Record file and review and comment on the Proposed Plan.

**Groundwater**: Water beneath the ground surface that fills pore spaces between materials such as sand, soil, or gravel to the point of saturation. In aquifers, groundwater occurs in quantities sufficient for drinking water, irrigation, and other uses. Groundwater may transport substances that have percolated downward from the ground surface as it flows towards its point of discharge.

**Hazard Index (HI)**: The ratio of the daily intake of chemicals from onsite exposure divided by the reference dose for those chemicals. The reference dose represents the daily intake of a chemical not expected to cause adverse health effects.

**Information Repository**: A file containing information, technical reports, and reference documents regarding an NPL site. This file is usually maintained in a place with easy public access, such as a public library. However, for security reasons following September 11, the library could no longer be used.

**Initial Assessment Study (IAS)**: The first of two phases of environmental investigation under the Navy Assessment and Control of Installation Pollutants program. The IAS is a preliminary evaluation of the facility that (1) identifies areas potentially contaminated by previous handling, storage, and disposal of hazardous substances; (2) assesses the potential effects of the contamination on human health and animals; and (3) recommends remedial measures appropriate for the contaminated areas. The second phase of the Navy Assessment and Control of Installation Pollutants program, the Confirmation Study, is completed if further action is required.

**Maximum Contaminant Level (MCL)**: The highest level of a contaminant that is allowed in drinking water. MCLs are enforceable standards.

**National Oil and Hazardous Substances Pollution Contingency Plan (NCP)**: The purpose of the NCP is to provide the organizational structure and procedures for preparing and responding to discharges of oil and releases of hazardous substances, pollutants, or contaminants.

**Proposed Plan**: A public participation requirement of Superfund Amendments and Reauthorization Act of 1986 (SARA) in which the lead agency summarizes the preferred cleanup strategy and rationale for the public. This agency also reviews the alternatives presented in the detailed analysis of the feasibility study. The Proposed Plan may be prepared either as a fact sheet or as a separate document. In either case it must actively solicit public review and comment on all alternatives under consideration.

**Record of Decision (ROD)**: An official public document that explains which cleanup alternative(s) will be used at a NPL site. The ROD is based on information and technical analysis generated during the RI/FS and consideration of public comments and community concerns. The ROD explains the remedy selection process and is issued by the Navy following the public comment period.

**Remedial Investigation (RI)**: An in-depth study designed to gather data needed to determine the nature and extent of contamination at a Superfund site, establish site cleanup criteria, identify preliminary alternatives for response action, and support technical and cost analyses of alternatives.

**Response Action**: As defined by Section 101(25) of CERCLA. Response Action means remove, removal, remedy, or response action, including related enforcement activities.

**Responsiveness Summary**: A summary of oral and written public comments received by the lead agency during a comment period and the responses to these comments prepared by the lead agency. The responsiveness summary is an important part of the ROD, highlighting community concerns for decision makers.

**Risk-Based Concentration (RBC)**: Conservative screening chemical-specific values which are protective of human health, that are used to identify COPCs.

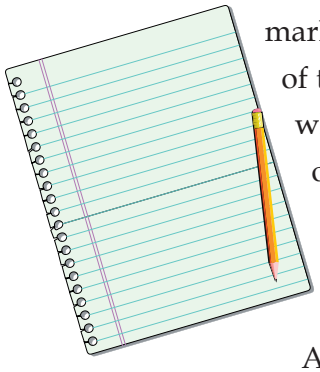
**Superfund**: The program operated under the legislative authority of CERCLA and SARA that funds and carries out EPA solid waste emergency and long-term removal and remedial activities. These activities include establishing the National Priorities List, investigating sites for inclusion on the list, determining their priority, and conducting and/or supervising the cleanup and other remedial actions.

Please print or type your comments for Site 13 here

## Mark Your Calendar for the Public Comment Period

### Public Comment Period
**May 28 - June 28, 2004**

### Submit Written Comments



Written comments must be postmarked no later than the last day of the public comment period, which is June 28, 2004. Based on the public comments or on any new information obtained, the Navy may modify the Preferred Alternative. The insert page of this Proposed Plan may be used to provide comments, although use of the form is not required. If the form is used to submit comments, please fold page, seal, add postage where indicated, and mail to addressee as provided.

### Attend the Public Meeting
**June 17, 2004 from 5 p.m. to 7 p.m.**

Senior Center
100 Cornwallis Square
Indian Head, MD 20640

The public comment period will include a public meeting during which the Navy, EPA, and MDE will provide an overview of the site, previous investigation findings, remedial alternatives evaluated and the Preferred Alternative; answer questions; and accept public comments on the Proposed Plan.

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Place stamp here

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