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LETTER AND THE U S EPA REGION III COMMENTS REGARDING THE DRAFT UNIFORM
FEDERAL POLICY SAMPLING AND ANALYSIS PLAN SITE 66 EXPANDED REMEDIAL
INVESTIGATION RESPONSE TO COMMENTS NSWC INDIAN HEAD MD
06/23/2014
U S EPA REGION III PHILADELPHIA PA



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

June 23, 2014

Joseph Rail, P.E.
NAVFAC Washington
1314 Harwood St. SE, Bldg. 212
Washington Navy Yard, DC 20374-5018

Subject: Draft Uniform Federal Policy-Sampling and Analysis Plan, Site 66 - Turkey Run Disposal Area Expanded Remedial Investigation Response to Comments.

Mr. Rail:

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

EPA BTAG Comment 1: Regarding the responses to comments 1 and 2, BTAG remains concerned about the groundwater – surface water pathway. It is acknowledged that additional groundwater samples will be collected downgradient of the site and, depending on the results, additional direct evaluation of the hyporheic zone may be warranted. The following reference should be reviewed when designing the investigation if necessary:

http://www.epa.gov/oswer/riskassessment/ecoup/pdf/eco_update_08.pdf.

BTAG also acknowledges that the proposed sediment toxicity testing should provide further information on the groundwater – surface water pathway, in addition to surface runoff pathways that may impact sediment.

EPA BTAG Comment 2: Comment 3 indicates that all ash would be removed as part of any remedial action. BTAG agrees with this approach to eliminate source material which presents unacceptable ecological risk from exposure to this material. This will also help address concerns related to contaminant transport to the creek.

EPA BTAG Comment 3: Comment 4 was discussed at the Partnering Team meeting. The Navy acknowledged that as the lead agency they were responsible for coordinating with natural resource trustees during the CERCLA process. This coordination can be facilitated through the BTAG.

EPA BTAG Comment 4: All other comments have be adequately addressed.

EPA Hydro Comment 1: Mindi is ok with the response, but I'm unable to locate the DPT that will be placed North of Olsen Road on the Figure 5 anywhere?

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

Sincerely,

A handwritten signature in black ink, appearing to read 'John Burchette', with a large, sweeping flourish at the end.

John Burchette
Remedial Project Manager

cc: Curtis Detore