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NSWC INDIAN HEAD  
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LETTER AND U S EPA REGION III COMMENTS REGARDING THE DRAFT SITE 43  
REMEDIAL INVESTIGATION NSWC INDIAN HEAD MD  
09/08/2014  
U S EPA REGION III PHILADELPHIA, PA



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

September 8, 2014

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

Subject: Draft Site 43 RI. February 2014.

Mr. Rail:

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

Tox Comments have been adequately addressed.

EPA RPM Comment 1 Response: The text of the document should be modified to include the discussion as to why we do not believe the chromium is a site related COCs. The discussion should include things such as those discussed in the RTC. Frequency of the detections above background, magnitude of that detection above background and the toxicity evaluation as hex vs tri.

EPA RPM Comment 2 Response: All buildings within 100' of an MCL exceedence need to be evaluated for VI. Other data can be used as multiple lines of evidence but the preference is for buildings to be assessed directly. If subslab cannot be evaluated directly due to the construction of the buildings, then indoor air should be assessed directly. An action such as institutional controls should not be taken under CERCLA if risk has not been demonstrated. Additionally, the building should not be occupied if it is not evaluated. In an effort not to hold up the RI, the VI evaluation could take place as part of the RD provided the the remedy selected a component to treat buildings exceeding risk numbers.

EPA RPM Comment 5 Response: Was perchlorate analyzed in groundwater?

EPA Hydro Comment: Since the source will(may jb) be removed, then additional RI work is not necessary. However, it is important to know the following for (the potential jb) source removal:

1. How the source area will be determined with respect to stratigraphy (i.e. does source move through clays and sand, or just sands) and concentrations;
2. If the divide, stratigraphy, or both affects movement of the plume

Hydro Comments 2 and 3 should be made clear during remediation of the source.

Additionally, the concentrations and location of cobalt is problematic, especially since it exists in a different location than the groundwater plume and source. I think a conference call to discuss the cobalt issues with the Navy and Dawn Ioven, the toxicologist, will assist in this area.

And finally, it is not clear when the sampling for indoor air will occur.

Response to BTAG Comment 1. BTAG requests information on the Navy policy to not analyze CERCLA contaminants based upon a conceptual model. Regardless, BTAG cannot make any conclusions regarding ecological risk in surface soils at the site and can only review the information associated with VOCs and metals in surface water, sediment, and groundwater samples. The following statement which is offered is confusing: “Ecological risks to chemicals in surface soil were not evaluated, per Team agreement, because the Site 43 SSP Report (Tetra Tech, 2009) concluded no unacceptable risks exist to ecological receptors exposed to site-related contaminants in surface soil.” Please clarify how the team concluded no unacceptable risks exist to site related contaminants in surface soil exist if ecological risks to chemicals in surface soil were not evaluated. If the reason is that sufficient ecological habitat does not exist at the site, BTAG does not concur with this conclusion.

Response to BTAG Comment 2. BTAG does not agree that food chain exposures are not significant from surface water and sediment because of the limited habitat in channels. This is a subjective statement and furthermore, aquatic habitats/areas are highly attractive to ecological receptors, even if just temporal in nature. Fish are not required to be present for food chain exposures to occur. The comparisons of arsenic concentrations to background is a risk management step that should be conducted after the risk assessment. Further information should be presented to support the conclusion that a concentration of arsenic of 1.21 ug/l would not result in adverse effects to birds or mammals. BTAG cannot make any conclusions regarding ecological risks posed by CERCLA contaminants that have not been analyzed.

Response to BTAG Comment 3. BTAG generally agrees with the responses to Comment 3. Since the water levels in the channels are influenced by precipitation events there may be times when the hyporheic zone is entirely representative of groundwater.

Response to BTAG Comment 4. BTAG agrees that this comment/response is related to comment 1; however, we do not agree that analyzing for the full suite of CERCLA contaminants is “blind”. This is based upon experience at countless Superfund sites and it is not unreasonable to believe that all activities at this location are known or have been adequately recorded.

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

Sincerely,

A handwritten signature in black ink, appearing to read "John Burchette". The signature is stylized with a large, sweeping initial "J" and a long, horizontal stroke extending to the right.

John Burchette  
Remedial Project Manager

cc: Curtis Detore