



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

Section : 2.01
Site 20903-5640 (White Oak)
Doc. #: 0036

00054

N60921.AR.000284
NSWC WHITE OAK
5090.3a

April 14, 2000

Mr. Walter Legg
Engineering Field Activity Chesapeake
Washington Navy Yard, Building 212
1314 Harwood Street, S.E.
Washington, DC 20374-5018

Re: Review of Draft Engineering Evaluation/Cost Analysis (EE/CA) for Site 3 for the Former Naval Surface Warfare Center

Dear Mr. Legg:

The United States Environmental Protection Agency Region III has reviewed the above report. The EE/CA is clearly written and contains all significant required elements of an EE/CA. The comments below pertain to minor discrepancies or inadvertent omissions.

GENERAL COMMENTS

1. Several sections need to include brief statements concerning the results of chemical analyses or study observations:
 - a. *Section 1.10.1.* The types of wastes identified in the Initial Assessment Study should be described in this section.
 - b. *Section 1.10.3.* Although a later section indicates the quality of the data collected during the Phase I and Phase II Remedial Investigations are questionable, it would be still be informative to include a summarization of the surface water, sediment, and groundwater data collected during these investigations to provide a historical perspective.

Also, Appendix D.3 should be referenced in this section, if the 1989 and 1991 soil data were from the Phase I and Phase II Remedial Investigations.

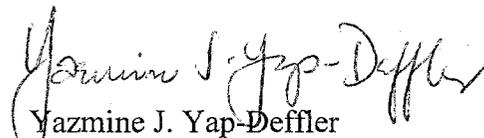
SPECIFIC COMMENTS

1. *Executive Summary, Page ES-1.* A brief discussion of the current or potential threat posed by the site conditions should be added to the executive summary.
2. *Section 1.1, Page 1-1.* The USGS topographic quadrangle on which the site can be located, and the latitude and longitude of the site, should be included in this section.

3. *Section 1.2, Page 1-2.* This section states 15,000 cubic yards of waste and fill are in the landfill. However, the volume estimate provided in Section 1.11.2.2 estimates the volume of material at Site 3 is estimated to be 20,400 cubic yards. This apparent discrepancy should be addressed.
4. *Section 1.4, Page 1-2 and Section 1.7, Page 1-4.* No information concerning the source(s) of potable water supplies in the area is provided. The source(s) of potable water supplies in the vicinity of the site should be summarized.
6. *Section 1.11.2, Page 1-8 and Table 1-1.*
 - a. The version of the Region III risk-based concentrations (RBCs) table should be specified. The table indicates the 1999 version, however, there were April 1999 and October 1999 versions; the October 1999 table should be used.
 - b. It appears a hazard quotient (HQ) of 0.1 was used for noncarcinogens and a risk factor of 1×10^{-6} for carcinogens. This is appropriate, however, this information should be included in the text and table.
7. *Figure 1-3.*
 - a. Test Pits should be designated according to Appendix C Test Pit Logs.
 - b. Sample location designations are unclear/incomplete. The figure should be reworked.
8. *Appendix E, Cost Estimate Table for Alternative 2.* Item 4.5 of the table includes confirmatory sampling, however, the text indicates no confirmatory sampling will be conducted. This apparent discrepancy should be addressed. If these costs are for waste characterization prior to offsite disposal, it should be so stated.

If you have any questions, please call me at (215) 814-3369.

Sincerely,



Yazmine J. Yap-Deffler
Remedial Project Manager
Federal Facilities Section

cc: Jeff Thornburg, MDE
Steven Richard, GSA