



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

Section: 3.01  
Site 20903-5640 (White Oak)  
Doc. #: 0024

00104

N60921.AR.000316  
NSWC WHITE OAK  
5090.3a

September 15, 2000

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

Re: Memorandum: Methods for Preparing the Human Health Risk Assessment for Operable Unit 1 and Site 46, NSWC - White Oak

Dear Mr. Legg:

The United States Environmental Protection Agency Region III has reviewed the above technical memorandum and has the following comments:

1. As stated in the May 17, 2000 comment #6. Section 4.0, Exposure Assessment, page 6. The 95% UCL should only be used when 5 or more samples are collected. For data sets with less than 5 samples, the UCL is considered to be a poor estimate of the mean, and the exposure point concentration is defined as the maximum detected and arithmetic mean (if less than maximum) for RME and CTE scenarios, respectively.
2. Section 4.0, Exposure Assessment, page 6. The fifth paragraph discusses evaluating the future residential adult and child to surface and subsurface soil in the risk assessment. Please provide the rationale for evaluating these receptors exposure to subsurface soil? It would appear these receptors should only be evaluated for exposure to surface soil. In fact, evaluating these receptors to both surface and subsurface soil could actually mask the concluding risk results.
3. Please provide the rationale for only conducting a qualitative analysis for the Adult/Child Trespasser exposed to surface water and sediment in Isherwood Drive Stream and the Adult Resident exposed to surface water and sediment in Westfarm Branch?
4. Table 2.1 and 2.8, Occurrence, Distribution and Selection of Chemicals of Potential Concern. Please provide the surrogates that were used for benzo(g,h,i)perylene and di-n-butylphthalate.
5. Table 2.1, Occurrence, Distribution and Selection of Chemicals of Potential Concern. The correct SSL for beta-BHC is .0031. Please recheck this value.

6. Table 2.6, Occurrence, Distribution and Selection of Chemicals of Potential Concern. The correct RBC for chloroform is 1.5 ug/L. Please recheck this value.
7. Table 2.7, Occurrence, Distribution and Selection of Chemicals of Potential Concern. The reported units for surface water should be ug/L, not mg/kg as reported on this table. Please recheck these values and units.
8. Table 2.7, Occurrence, Distribution and Selection of Chemicals of Potential Concern. The maximum arsenic value reported on Table 2.7 does not agree with the maximum value reported in Table 3.5. Please check this discrepancy.
9. Table 2.12, Occurrence, Distribution and Selection of Chemicals of Potential Concern. The correct RBC for chloroform is .15 ug/L. Please recheck this value.
10. Table 2.12 and 2.13, Occurrence, Distribution and Selection of Chemicals of Potential Concern. The correct RBC for 2,4,6-trinitrotoluene is 2.2 ug/L. In addition, the RBC table list this contaminate as a carcinogen. Please recheck this value.
11. Tables 3.1 through 3.14. The 95%UCL could not be verified for these tables since the report did not include the complete data results.
12. Table 5.1, Non-Cancer Toxicity Data - Oral/Dermal. The correct chronic oral RfD for 1,3-dichlorobenzene is 9.0E-04. Please recheck this value.
13. Table 5.2, Non-Cancer Toxicity Data - Inhalation. According to the April 13, 2000 RBC table there is no inhalation RfD for 1,3-dichlorobenzene. Please recheck this value.
14. Table 5.2, Non-Cancer Toxicity Data - Inhalation. The correct inhalation RfD for chlorobenzene is 1.7E-02. Please recheck this value.

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