



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

Section: 12.01
Site 20903-5640 (White Oak)
Doc. #: 0008

00378

N60921.AR.000252
NSWC WHITE OAK
5090.3a

December 10, 1999

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

Re: Review of the Navy's Response to EPA Comments on the Draft RCRA Facility
Investigation Former Naval Surface Warfare Center

Dear Mr. Legg:

The United States Environmental Protection Agency Region III has reviewed the above document. EPA accepts the Navy's responses with the exception to the two items noted below.

GENERAL COMMENTS SECTION

- *Comment No. 9.* EPA comment was that the Region does not recognize the use of piezometer (PZ) samples for risk assessment. The Navy's response was that the 3 PZ samples collected out of 36 gw samples were comparable to what was collected in the other samples and that removal of these samples would not result in significant differences to the calculated risks. The Navy requested that EPA reconsider its policy on this matter since the removal of these 3 PZ data from the data set would require additional labor that requires recalculation of the risks and exposure concentration and would not yield any significant change in the conclusions.

EPA's Response

- It is unclear why the Navy still pursued this approach. The Navy is aware of EPA Region III's policy that piezometer data cannot be used for risk calculations. This has been made clear to the Navy on numerous BCT meetings and comments regarding this issue. From those meetings it was EPA's understanding that the Navy had agreed not to use PZ data for its risk assessment calculations. In light of the time constraints for Site 11 and this event did not produce any significant changes to the risk assessment, EPA will allow the use of these three (3) PZ data **only for this effort**. The Navy should put an editorial note in the risk assessment section of this Site 11 RFI report that the piezometer data was used for the risk assessment.

SPECIFIC COMMENTS SECTION

- *Comment No. 15.* EPA comment that the recommended construction worker exposure frequency be 250 days/year instead of the Navy's use of 180 days/year. The Navy's response was that it recognizes that the 250 days/year was more conservative, it will not significantly impact any risks already calculated for the site and that it would only result in editorial changes to tables and text.

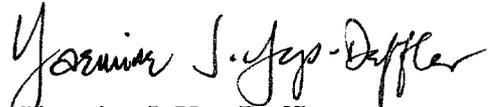
EPA's Response

- Again, EPA commented had previously commented on the construction worker exposure frequency and the Navy had agreed to use this scenario. This has been made clear to the Navy on numerous BCT meetings and comments regarding this issue. From those meetings it was EPA's understanding that the Navy had agreed not to use the 250 days/year exposure frequency for the risk assessment calculations. In light of the accelerated schedule for Site 11 and since this event did not produce any significant changes to the risk assessment, EPA will allow the use of the 180 days/year frequency **only for this effort.**

Note that for any subsequent submittal, EPA will not allow the use of piezometer data for risk assessment calculations. In addition, the Navy shall revise the construction worker exposure frequency to 250 days/year.

If you have any questions regarding this matter, you can reach me at (215) 814-3369.

Sincerely,



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

cc: Paul Leonard, EPA Region III
Jeff Thornburg, MDE
Steven Richard, GSA