

Section: 1.01
Site 20903 5640 (White Oak)
Doc. #: 0024

00747

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

August 12, 2005

Mr. David Steckler
NAVFAC Washington (Code 181)
1314 Harwood Street, S. E.
Washington Navy Yard
Washington, DC 20374-5018

Subject: Draft SSR Site 33

Dear Mr. Steckler:

The EPA has reviewed the **Draft Site 33 Site Screening Report** at the Former Naval Surface Warfare Center (NSWC) White Oak, located in Silver Springs, Maryland. This document is dated April, 2003.

GENERAL COMMENTS

1. The document presents a short, clear evaluation of the risk evaluation based on post-removal sampling for this site. It might help to include a discussion of the current situation for this site, the building was demolished and most of the surrounding soil, including the location of the former tank, has been disturbed.
2. This report still needs all the appendices and Figure 2-1.

SPECIFIC COMMENTS

3. Section 1.3, Page 1-2, Paragraph 5. Please add a new third sentence; "There was no evidence of contamination (stained soil) on the walls or floor of the excavation." Also in the fifth line, please add "No groundwater samples were collected because there was no evidence of soil contamination and there were no known releases from the former tank" as a new next to last sentence.
4. Section 1.3, Page 1-2, New Last Paragraph. Please add a new last paragraph to describe the current situation at the site of the former tank. "In 2004, as part of redevelopment by GSA, the site of the former underground tank was re-excavated during the demolition of Building 25. The area is now a parking area in support of a new laboratory building."

5. Section 1.4.1, Page 1-3, Paragraph 3. Please rewrite the last sentence to indicate “, if not, it was eliminated as part of a risk management evaluation” after “as a COPC”.
6. Section 1.4.1, Page 1-3, Paragraph 4, Line 12. Please add “nor inhalation pathways” after dermal; and drop “exposure”.
7. Section 1.4.2, Page 1-4, Paragraph 1. Please add “as part of a risk management analysis” after “was warranted” in line 9. Also, please delete the next to last sentence in this paragraph.
8. Section 2.1, Page 2-1, Paragraph 1. Please add a sentence to indicate that clean fill was placed in the hole after the tank removal and therefore the risk screening involves the potential residual risks.
9. Section 2.1, Page 2-1, Paragraph 1. Please add a new next to last sentence, “Because of the limited number of subsurface soil samples (2), the statistically valid Wilcoxin Rank Sum test was not performed, but a direct comparison to inorganic background concentrations and average values is presented.” Also, Appendix A is referenced, please add this appendix to the report.
10. Section 2.1.1, Page 2-1, Paragraph 2. Please add Figure 2-1 to the report.
11. Section 2.1.1, Page 2-1, Paragraph 4. In the first sentence, please add “for these seven inorganics” after “Risk ratios”.
12. Section 2.1.2, Page 2-2, Paragraph 1. Please add all the inorganics, with the corresponding soil-to-groundwater screening values to Table 2-4. In addition to chromium, cadmium and thallium should be discussed as exceeding groundwater SSLs.
13. Section 2.1.2, Page 2-2, Paragraph 1. Please delete the third and fifth sentences.

14. Section 2.1.2, Page 2-2, Paragraph 1. Please add, as a new next to last sentence, "Additionally, the entire area where the former underground tank existed has been disturbed and the currently is a parking area. The volume of soil exceeding soil-to-groundwater SSLs is very small and should not be a residual source of contamination to groundwater."

If you have any questions concerning these comments, please call me at (215) 814-3364.

Sincerely,



Bruce W. Beach
Remedial Project Manager
Federal Facilities Branch

cc: Andy Zarins, MDE
Scott Nesbit, Tetra Tech NUS
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