

Response To Comments

Draft Record of Decision for OU14, Site 90

MCAS Cherry Point, North Carolina

July 27, 2009

Comments received by email on July 21, 2009 from Gena Townsend, U.S. Environmental Protection Agency (USEPA), and by email on July 22, 2009 from George Lane, North Carolina Department of Environment and Natural Resources (NCDENR).

All USEPA and NCDENR comments indicating revisions to the OU14 Record of Decision will be incorporated for agency review and approval into the Draft-Final OU14 Record of Decision as instructed, with the exception of the following USEPA comments, for which minor suggested revisions are offered:

1. Page 2-12 comment - Table 3 (Summary of Potential Human Health Risks). The comment instructs to highlight a cell in the table to indicate a potential risk.

Response: The indicated cell will be highlighted. However, examination of the table to address this comment led to the discovery of several other related errors in the table and elsewhere in the text. In addition to the indicated cell in the Future Child and Adult Lifetime Resident rows, there are 4 other cells in the table in which the risk range is exceeded that should have been highlighted. These cells in which a cancer risk greater than 10^{-4} is indicated will be highlighted as well.

In addition, it was noticed that the two highlighted cells in the last row of the table, Construction Worker, should not have been highlighted. Although the hazard indices are greater than 1, as explained in the HHRA in the RI and summarized in the FS, these do not represent findings of risk because no individual constituents or target organs had HIs above 1. The following changes are proposed:

(a). Change the row header in Table 3 from "Construction Worker" to "Future Construction Worker".

(b). In Table 3, Construction Worker Row, remove the yellow highlighting from the two non-cancer risk HI columns and replace with the background gray highlighting. Add a "***" footnote marker after the HI in each of these formerly yellow-highlighted cells and a footnote at the bottom of the table that reads: "***While this HI exceeds USEPA's benchmark of 1, no individual constituents or target organs had HIs above 1. In addition, the carcinogenic risk to a future construction worker from exposure to surficial aquifer groundwater is within USEPA's target range. Therefore, there were no calculated hazards or risks to a future construction worker above USEPA's benchmark levels."

(c). The first sentence of the 4th paragraph of Section 2.9.1, Rationale for Selected Remedy, page 2-20, incorrectly states that there were unacceptable risks for future construction workers. Delete the words "future construction workers and" from this sentence.

(d). The 2nd sentence of the 5th paragraph of Section 2.5.1, Human Health Risk Assessment, is currently ambiguous about which receptors the finding of unacceptable risk applied. It is proposed to add the phrase "for the future and lifetime adult and child resident receptors" to this sentence to avoid the incorrect interpretation that the finding of unacceptable risk also applied to the future construction worker receptor.

2. Page 2-13 comment - Section 2.5.3, Basis for Action. It is instructed that the sentence "Based on the HHRA, exposure to groundwater at OU14 poses an unacceptable risk to human health due to the presence of....." be added.

Response: As the phrase "exposure to groundwater" is not specific enough to accurately describe the findings of the HHRA, which found unacceptable risks only with respect to exposure by future residents, it is suggested that the sentence to be added read:

"Based on the results of the HHRA, exposure to groundwater by potential future residents at OU14 poses an unacceptable risk to human health due to the presence of vinyl chloride."

3. Page 2-13 comment - Section 2.5.3, Basis for Action. It is instructed that the last paragraph to be revised with the following wording:

"It is the current judgment of the Navy, MCAS Cherry Point and USEPA, in concurrence with NCDENR, that..."

Response: On page 1-1 of the ROD, 2nd paragraph, the term "Navy" is defined to consist of NAVFAC Mid-Atlantic and the MCAS Cherry Point EAD. Therefore, to be consistent with earlier references, it is proposed that the revised paragraph begin:

"It is the current judgment of the Navy and USEPA, in concurrence with NCDENR, that..."

The remainder of the paragraph will be revised as instructed.

4. Page 2-14 comment - Section 2.7 Remedial Action Objectives. It is instructed to add a bullet stating:

"Restore groundwater quality at OU14 to the NCGWQS and maximum contaminant level (MCL) standards based on the classification of the aquifer as a potential source of drinking water (Class GA or Class GSA) under 15A NCAC 02L.0201"

Response: Rather than *adding* this bullet to the others, to avoid redundancy it is proposed that this text *replace* the existing bullet: "Reduce exceedances of COCs to cleanup levels."

5. Page 2-19 comment - Section 2.9.1 Rationale for Selected Remedy. The comment indicates that the last sentence needs more explanation - "Residential land use and use of surficial aquifer groundwater as a potable water source at OU14 are not likely to occur". It is instructed that additional explanation of this statement be added and possible example language is provided.

Response: It is proposed that the sentence be revised and expanded into 2 sentences as follows:

"Residential land use and use of surficial aquifer groundwater as a potable water source at OU14 are not likely to occur, as the site is an active flightline area on a military installation for which there is no indication of plans for closure or reassignment of mission. In addition, potable groundwater supplies at MCAS Cherry Point and in the surrounding coastal plain area of North Carolina are not derived from the surficial aquifer, but from more-productive, underlying aquifers that are separated from the uppermost surficial aquifer by one or more confining units that limit inter-aquifer groundwater flow."

6. Page 2-21 comment - Figure 6 (Land Use Control [LUC] Boundaries). The comment indicates that the LUC boundaries should be drawn in a more amenable way to support the surveying. It further indicates that there should be two LUC boundaries: (1) for no intrusive activities below the water table and (2) for no well installation or use of groundwater; it is stated that the (2) LUC boundary should be larger in area than (1).

Response: It is agreed that the LUC boundaries be redrawn using straight lines instead of curves in order to facilitate the surveying and also to define two LUC boundaries. A revised Figure 6 for agency review will be provided in the Draft-Final ROD with two LUC boundaries: (1) the LUC boundary for no intrusive activities below the water table and for vapor intrusion to be evaluated in the event of new building construction or a change in existing building physical configuration or occupancy, and (2) the LUC boundary for the prohibition of well installation or groundwater use other than for monitoring or remediation purposes.