



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

April 28, 2000

DW-8J

Mr. Tom Brent
Naval Surface Warfare Center
EPD, Code 095 B-3260
300 Highway 361
Crane, IN 47522-5001

Re: Risk Screening Documentation
Comments for SWMUs # 14/00,
17/04, 24/00, and 26/08D

Dear Mr. Brent:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Risk Screening Documentation Reports dated December 1999 for Solid Waste Management Units (SWMUs) 14/00, 17/04, 24/00, and 26/08D.

U.S. EPA's comments are attached to this letter. The attachment includes the comments sent electronically on February 22, 2000. Please revise the reports to address these comments.

If you have any questions regarding this matter, please contact me at (312) 886-7890.

Regards,

A handwritten signature in black ink, appearing to read "Peter Ramanauskas".

Peter Ramanauskas
Environmental Engineer
WMB, Corrective Action Section

Enclosure

Filename: Comments on Reports.wpd

cc: Core Team Members: Bill Gates, SOUTHDIV
Doug Griffin, IDEM

Project Team Members: Mario Mangino, U.S. EPA

**Comments on Risk Screening Documentation
for SWMUs 14/00, 17/04, 24/00, and 26/08D**

February 22, 2000 Comments:

Comment 1:

In the SWMU 24/00 - Sludge Drying Beds A & B report, Beryllium has been included in Table 4 and identified as a contaminant of concern though it has not been included in Tables 1 through 3 or in Section 3.0. Additionally, Section 6.2, Ecological Receptor Exposure Pathways mistakenly refers to routes of exposure for *human* receptors.

Comment 2:

In the SWMU 14/00 - Sanitary Landfill & Lithium Battery report, it is stated that the Lithium cleanup level was set at 1600 mg/kg in agreement with the USEPA. However, the units for Lithium cleanup level in the Highway Dump Site B report (Table 3) are presented as ug/kg. Please correct this discrepancy. Also, the EDQL values in Table 3 of the Lithium Battery report are in ug/kg while Note 1 states that all levels are reported in mg/kg.

Comment 3:

For the Highway Dump Site B report and the Lithium Battery report, please reformat Section 6.0 to present exposure pathways similar to the Sludge Drying Beds report.

Comment 4:

What is the rationale for further groundwater investigation at Highway Dump Site B, but not at the other two units (i.e., Sludge Bed B and Lithium Battery)? Include an explanation in the reports.

April 27, 2000 Comments:

Comment 1:

In Section 6.1 and 6.2 of the PCB Capacitor report, the Highway 58 Dump Site B report, the second sentence is not very clear as written. Please reformat these sections.(see Comment 3 - February 22, 2000 comments).

Comment 2:

For the SWMU 14/00 - Sanitary Landfill & Lithium Battery Report, please attach a copy of the MK letter NAV/MKC-170 dated August 14, 1995 regarding cleanup levels for Lithium. Section 4.0 discusses the construction of the Bioremediation facility on the Lithium Battery site. Please provide a discussion of the potential risk reduction created (if any) by the construction of the Biofacility at the site (e.g. exposure reduction due to paved areas).

Comment 3:

For the SWMU 14/00 - Sanitary Landfill & Lithium Battery Report, Section 3.0 states that arsenic, beryllium, and cobalt were found to exceed cleanup levels in the confirmation samples, but were determined to be present due to natural background levels. Note that there are no Arsenic values in Table 2 which exceed the cleanup level of 9.4 mg/kg. Please provide evidence that the background levels compare to those of the Base-Wide Background study or, if the results of the Base-Wide Background study are currently unavailable, show that these metals are not statistically significant from background.

Comment 4:

For the Highway Dump Site B report, please reformat Table 2 to create separate tables for progress samples and confirmation samples.