

5/4/04 - 9/21/04

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Ms. Michele DiGeambeardino, Project Manager
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop 82
Lester, PA 19113-2090

Re: Proposed Plan for Sites 6, 12, 15 and 17 (Operable Unit 9)

Dear Ms. DiGeambeardino:

Attached are EPA's comments on the above referenced report. If you have any questions, please contact me at (212) 637-3921.

Sincerely,

Jessica Mollin, Remedial Project Manager
Federal Facilities Section

Attachment

cc: R. Marcolina, NJDEP
L. Burg, Navy-Earle

Comments on Draft Proposed Plan - OU-9

General Comments

1. Explain why there is no description of applicable ARARs in the document.
2. Explain why regulatory levels are not discussed (i.e., MCLs).
3. When stating the levels which contaminants were found at, explain what these levels mean (i.e., see comment #12).
4. Refer to the Tables in the text.
5. The results of the human health analysis are presented in an inconsistent manner. For example, Site 15 only highlights the non-cancer hazards without addressing potential cancer risks while Site 17 provides both. If the contaminants of concern for Site 15 do not pose a cancer risk then this should be highlighted in the text.
6. Explain how the comparison criteria was evaluated, include:
 - a) source of background data
 - b) how it was concluded if it was site related or not site related

Specific Comments

7. Site 15 - Explain how remedy addresses exceedances in surface and sub-surface soil. Discuss if there is a possibility of impact to groundwater.
8. Page 4, 2nd column, IAS paragraph. Discuss in more detail why Site 6 was not chosen for a confirmation study.
9. Page 4, 2nd column, Phase I RI/FS Results paragraph: 1) Discuss what "low levels" means (i.e., below regulatory levels). 2) Indicate what the elevated levels of metals, one SVOC and two miscellaneous parameters in groundwater were. 3) Explain what landfill parameters are and why they are taken.
10. Page 5, 2nd column, PAH paragraph. Explain why pesticides would be found in background samples. Indicate if there were any exceedances of PAHs.
11. Page 7, 1st column, 2nd paragraph. Explain why surface water indicator parameters were not considered to be within a range typically associated with concentrated landfill leachate.
12. Page 7, 2nd column, 2nd paragraph. Explain what the TPH levels in the two soil pile samples indicates. Are these levels below regulatory concerns?
13. Page 8, 1st column, 2nd paragraph. Indicate if there was sampling done in the salt marsh.

14. Page 8, 1st column, 4th paragraph. Explain why no wells were installed.
15. Page 9, 1st column, 1st paragraph. Indicate which SVOCs were detected at low levels and which metals were found in elevated levels in groundwater.
16. Page 10, 1st column, 3rd paragraph. Explain what the TPH levels of 9.0 to 100 mk/kg in surface soil indicates.
17. Page 11, 2nd column, Phase I Remedial Investigation paragraph, last 3 sentences. Give more information on these elevated levels or note where these levels can be found (i.e., Table 10).
18. Page 12, 1st column, 1st paragraph under bullets. Where is the Navy's sampling data?
19. Page 12, 2nd column, Surface Soils paragraph. Explain why only one surface soil sample was taken.
20. Page 13, 2nd column, 2nd paragraph. Spell out TOC.
21. Page 14, 1st column, 1st paragraph. Explain what the chloride concentrations mean for landfill leachate.
22. Page 15 - Site 6. The discussion indicates that "In addition, results were compared to applicable federal and/or state standards such as federal Maximum Contaminant Levels (MCLs) for drinking water, NJDEP GWQS, or other published lists of reference values". This information should not be presented in the risk assessment portion of the report and may be more appropriately listed in the FS discussion. Consistent with Risk Assessment Guidance for Superfund, the risk information should be presented with one significant figure and not two as presented here and in the remainder of this section and for the other sites.
23. Page 16. The discussion of the non-cancer hazards here, and in other site summaries, fails to provide the actual calculated HI. To be consistent with the presentation of the results from the cancer assessment, and consistent with Agency guidance on the development of the Proposed Plan, it is appropriate to also list the non-cancer HI for the contaminants of concern. The discussions of the risks for the industrial worker fails to provide the calculated cancer risks. Consistent with the information presented for the future resident, the calculated risks should be presented.

The discussion regarding the maximum concentration of arsenic in groundwater, the average concentrations from four wells, and the background concentrations from another site are confusing. If the point of the discussion of the maximum concentration is to highlight an outlier, then this should be specifically stated including a discussion of the statistical tests performed to support the designation of the concentration as an outlier. Further, the Exposure Point Concentration, is calculated as a 95% UCL on the mean and the risks calculated with this information should be presented. The discussion regarding the background concentrations is inappropriate since it does not

address the statistical tests that were used to demonstrate that these concentrations are consistent with background concentrations consistent with EPA's background policy.

24. Page 16 - Site 12. This discussion seems out of place since the analyses for the other sites were conducted to support action while this section provides the results from post-excavation sampling. The discussion of the application of the IEUBK model is incorrect. First, the IEUBK model does not provide a calculated risk but rather a prediction regarding the percentage of the population above the goal of no more than 5% of the population with blood lead levels in excess of 10 ug/dl (see homepage at: <http://www.epa.gov/superfund/programs/lead/ieubk.htm#Risk>). It is also unclear what is meant by the 0 to 0.1% values. Are these indications of the percentages of children with blood lead levels above the CDC goal? Since information regarding the OSWER directive levels of lead in soil is already presented, it is unclear why the discussion of the IEUBK analyses is also required.

25. Page 17 - Section 15. Provide the calculated cancer risks for the residential receptors. Similarly, provide the calculated non-cancer HIs. Delete the discussion indicating that the RME calculations are "overly conservative". Suggest indicating both the RME and CT values with an indication that the RME is the basis for determining remedial action.

Regarding lead, identify the concentrations found and the guideline to which they are being compared. Regarding the information presented on the IEUBK model, suggest indicating that the 5% level is the value used to indicate a potential lead problem consistent with the lead homepage information available at: <http://www.epa.gov/superfund/programs/lead/ieubk.htm#Risk>

26. Page 17 - Site 17. Provide the calculated cancer risks for the industrial employee consistent with the information presented for the resident. The CTE for the resident should also be provided. The non-cancer HIs should also include the HIs for the industrial worker.

The discussion regarding the maximum concentration of arsenic in groundwater, the sample concentrations from three wells, and the background concentrations from another site are confusing. If the point of the discussion of the maximum concentration is to highlight an outlier, then this should be specifically stated including a discussion of the statistical tests performed to support the designation of the concentration as an outlier. Further, the Exposure Point Concentration, is calculated as a 95% UCL on the mean and the risks calculated with this information should be presented. The discussion regarding the background concentrations is inappropriate since it does not address the statistical tests that were used to demonstrate that these concentrations are consistent with background concentrations consistent with EPA's background policy.

The discussion regarding the lead concentrations requires clarification. Specifically, the remediation goal of 400 ppm is compared to the average concentration at the site and not the range. It is suggested that the average concentration should also be presented in the discussion. The IEUBK homepage:

<http://www.epa.gov/superfund/programs/lead/ieubk.htm#Risk> provides information regarding Superfund's policy.

27. Pages 18 & 19, Ecological Risks. The data needs to be quantified.

28. Page 18, 2nd column, first paragraph, first sentence. Where is this data?

29. Page 18, 2nd column, 3rd paragraph. Explain which concentrations in which media were **not** indicative of low potential risk. Spell out ET.

30. Page 19, 1st column, 1st paragraph. Indicate which HQ values were indicative of moderate risk.

31. Page 19, 2nd column, 1st paragraph. Describe which PAH compounds were present in surface water and sediment near the site in excess of screening values. Describe what the elevated levels of metals in surface water and PAHs in sediments near the landfill toe were.

32. Page 19, 2nd column, last paragraph, first sentence. Which data?

33. Page 32. Terms Used in the Proposed Plan. The discussion regarding the IEUBK model should be expanded to indicate that this model is used for children 0 to 7 years and that it predicts potential blood lead levels. The discussion of risk should be removed from this statement. The definition provided in RAGS - Part A, page 6-5. the RME is defined as the highest exposure that is reasonably expected to occur at a site. The RME estimates include both "high end" exposure factors (> 90th percentile) with average factors to develop an RME estimate of cancer risks and non-cancer HIs.