

Bernhardt, Aaron

From: Bernhardt, Aaron
Sent: Wednesday, February 04, 2009 2:39 PM
To: 'Keckler.Kymerlee@epamail.epa.gov'
Cc: Hoskins.Bart@epamail.epa.gov; Rich, Corey; Kenneth_Munney@fws.gov; Lewis, Mark; richard.conant@navy.mil; rtfinalyson@GFNET.com; val.jurka@navy.mil; Jupin, Bob
Subject: RE: Outline for RI

Thanks. I think we are ok with the comments but we may have a few minor responses.

As I started to go through the data groups, I realized that I neglected to define the surface soil/sediment depths (I thought I had but it must have gotten deleted during one of my iterations).

For human health: surface soil/sediment will be defined as any sample collected within the top 4 feet to be consistent with CT regs (a 2 to 4 foot sample would be included but a 4 to 6 foot samples would not be included).

For ecological: surface soil/sediment will be defined as any sample in the 0 to 2 foot range but with a starting depth at the surface. Therefore, a 0-2 foot sample would be included but a 1 to 2 foot sample or 1 to 3 foot sample would not be included. The reason is that a portion of the 0-2 foot sample would be in the biologically active zone, while little or no portion of the 1 to 2 foot or 1 to 3 foot samples would be in that zone.

Please let me know whether you are ok with this.

Also, I am going to try to e-mail the toxicity test plots and my initial evaluation of the toxicity test data by this Friday or Monday. I would like to have a call next week with the technical folks (Ken, Bart, and Todd) to discuss the plots and my initial evaluation.

Thanks,

Aaron

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-----Original Message-----

From: Keckler.Kymerlee@epamail.epa.gov [mailto:Keckler.Kymerlee@epamail.epa.gov]
Sent: Wednesday, February 04, 2009 10:51 AM

To: Bernhardt, Aaron

Cc: Hoskins.Bart@epamail.epa.gov; Rich, Corey; Kenneth_Munney@fws.gov; Lewis, Mark;
richard.conant@navy.mil; rtfinlayson@GFNET.com; val.jurka@navy.mil

Subject: Re: Outline for RI

Tables 4.1 through 4.7 Revise typo for "Groton" in the titles.

Table 4.2.RME Correct the source U.S. EPA, 1997 in the
footnote to match the table.

Tables 4.4.RME and 4.4.CTE Correct the source U.S. EPA Region IV,
2000 in the footnote to match the tables. Source U.S. EPA, 2002a used in the tables is not
provided in the notes.

Table 4.5.RME Please use the soil to skin adherence
factor of 0.3 mg/cm² for trespasser instead of 0.2 mg/cm². Although the
2004 EPA RAGS Part E does not have specific default values for recreational user/trespasser,
it recommends 0.3 mg/cm² for teens under miscellaneous activities. Please revise.

Tables 4.6.RME and 4.6.CTE Correct the sources MEDEP, 1994, U.S. EPA,
1997, and U.S. EPA, 2008 in the footnote to match the tables. The 2004 source used in the
tables is not provided in the notes. Parameters Q/C, Ut, Um, V, and F(x) are not necessary
and should be removed.

Section 5.0

Fate and Transport During the January 9, 2009 call, EPA questioned
whether samples were needed to determine if there was
migration from the Area A Wetland to adjacent downstream
areas.

Under "Surface Soil/Sediment", the first bullet/sentence is
confusing. Should it read: "Significant sedimentation
downstream unlikely because of organic material and thick
vegetative layer"? Or does it refer to toxicity? Please
clarify.

Section 6.0

HHRA The receptors selected for evaluation are the construction
worker and trespasser. This reflects what was discussed
during the January 7, 2009 call. The rationale for not
including the residential scenario is an appropriate
addition to the HHRA. However, it may be necessary to
evaluate this pathway for remedial action purposes.
However, consider that the construction worker might be
building and recognize that some future receptor may use
the new construction.

Exposure Tables As noted during on January 9, 2009, EPA no longer
recommends using body-weight based doses for inhalation
exposures but instead recommends using the unit risk and
reference concentrations. The inhalation tables for the
construction worker and trespasser do not reflect this
current recommendation.

Kymerlee Keckler, Chemical Engineer

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01/27/2009 04:03
PM

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cc

"Rich, Corey"
<Corey.Rich@tetrattech.com>
Subject
Outline for RI

All,

Attached is a proposed outline for the RI for the Area A Wetland, including the samples that we propose using and the evaluations that will be conducted. I tried to be as comprehensive as possible, but the actual RI may differ slightly once we start writing it. It should generally follow this outline. I can let you know if something significant changes. Also attached are tables that present the human health exposure factors that will be used in the RI.

Please provide any comments on the outline or exposure factors by Wed, Feb 4, 2009 or feel free to call me if you have any questions.

Thanks,

Aaron

(See attached file: General Outline for RI.doc)(See attached file:
Exposure Assumptions.xls)