12/29/06-02015

Capito, Bonnie P CIV NAVFAC Lant

From: Cole, Linda L CIV NAVFAC MidAtlantic
Sent: Wednesday, January 03, 2007 1:59 PM
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: ARF

Bonnie,

...and here's EPA Region 3 toxicologist's comment to the revised draft CAX Site 11 RI.

Linda

-----Original Message-----
From: Franklin.Greyson@epamail.epa.gov [mailto:Franklin.Greyson@epamail.epa.gov]
Sent: Friday, December 29, 2006 8:09
To: djoiner@mbakercorp.com; Cole, Linda L CIV NAVFAC MidAtlantic; Marlene.Ivester@CH2M.com; damiller@deq.virginia.gov; Laura.Cook@CH2M.com
Subject: Fw: RI for Site 11 - Yorktown - TOX Comment

Greyson Franklin
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USEPA Region 3 (3HS11)
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----- Forwarded by Greyson Franklin/R3/USEPA/US on 12/29/2006 08:08 AM -----

Dawn Ioven/R3/USEPA/US
12/27/2006 03:55 PM

To: Greyson Franklin/R3/USEPA/US@EPA
cc: Ben Mykijewycz/R3/USEPA/US@EPA
Subject: RI for Site 11 - Yorktown

(Ben, I'm cc'ing you on this because I'm not sure of Greyson's last day.)

Hi, Greyson. I reviewed the Revised Draft Remedial Investigation Report for Site 11 (Bone Yard) at Yorktown. I have only one significant comment to offer.

4,4'-DDD was observed in surface soil at up to 360 mg/kg. (At an excess cancer risk of 1E-06, the generic RBC for 4,4'-DDD under a residential exposure scenario is 2.7 mg/kg; for an industrial receptor, the generic RBC is 12 mg/kg.) Despite the high hit, this pesticide was not identified in the Baseline Risk Assessment (BLRA) as a risk driver. Why? Because in the BLRA, the assumed exposure point concentration for 4,4'-DDD in surface soil was only 18.4 mg/kg (which represents the 95th percent UCL of the mean). Clearly, with a maximum detection of 360 mg/kg, a hot spot exists at the site. This hot spot should be handled apart from the other analytical data for 4,4'-DDD in the BLRA, and some action should be considered to mitigate the potential risks associated with this high level of 4,4'-DDD in surface soil.

That's it, Greyson. If you have any questions, please let me know.
Thanks.

Dawn A. Ioven, toxicologist
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