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NSWC INDIAN HEAD
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E-MAIL TRANSMITTING COMMENTS ON HUMAN HEALTH RISK ASSESSMENT SITE 28
NSWC INDIAN HEAD MD
2/23/2005
NAVFAC WASHINGTON

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From: Morris, Jeffrey CIV (NAVFACWASH)
Sent: Wednesday, February 23, 2005 4:23 PM
To: 'Christine.Metcalf@CH2M.com'
Cc: Eugene.Peters@CH2M.com; DeTore Curtis (E-mail); Ed Corack; Jorgensen, Shawn; Kasim Margaret (E-mail); Latulippe George (E-mail); Morris, Jeffrey CIV (NAVFACWASH); Orenshaw Dennis (E-mail); Rail, Joseph CIV (NAVFACWASH)
Subject: NDWIH Site 28 HHRA - NAVFACWASH Comments

We've reviewed the revised Site 28 HHRA and have these comments.

General

Under the scenarios involving trespassers, it is not reasonable to assume a pregnant trespasser would be exposed to mixed soil 52 days of trespassing a year, since a normal pregnancy (9 months) would only last 40 weeks. Overall, we think a strong clarification should be made that you are separating the 200' by 200' area around Swale 3 from the rest of Site 28. As a result, we think that you can justify changing some of the assumptions in the exposure model (frequency, duration, etc.). Everything here can be modified through negotiation. The uncertainty section should address the difficulties found when using the IEUBK model for risk assessment.

Section 6.5.3

Page 6-15 - In the first and third paragraphs, probability is expressed as a simple number (i.e. "5"), while in the second paragraph, it is expressed as a percentage. Percentage should be stated for the first two values.

Section 6.7.4

In the last sentence of the final paragraph, believe "than" is missing following "other". Inserting it would make the sentence: "Use of this model for other than industrial receptors may result in an underestimate or overestimate of risks to these receptors."

Section 6.8

Since the conclusion apparently rules out the pregnant worker/trespasser scenarios, there is insufficient explanation regarding this decision, which seems incorrect anyway. Considering that Section 8 features a different list of potentially-at-risk receptors than Section 6.8, ensure there are no inconsistencies. There seems to be quite a bit of uncertainty regarding why the fetuses are driving the decision for a FS and we think there might be some good justification for tweaking the model a bit. In any event, it seems this might be a good candidate site for Risk Management. If you can, make a case for NFA. If we are going to address anything, we could perform an IRA to remove the acre of lead-contaminated soil, scrape and/or cover the zinc-affected soil to eliminate the ecological pathway, and then incorporate the confirmation sampling into the final RI, and close the site with NFA, at least with respect to soil.

Note: This section references a number of tables in Appendix G of the RI - when I went to the draft final version to look at them, I discovered most were missing. Make certain they are included in the final.