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LETTER AND THE U S EPA REGION III COMMENTS ON THE DRAFT UNIFORM FEDERAL
POLICY SAMPLING AND ANALYSIS PLAN SITE 66 TURKEY RUN DISPOSAL AREA
EXPANDED REMEDIAL INVESTIGATION NSWC INDIAN HEAD MD
04/30/2014
U S EPA REGION III PHILADELPHIA PA



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

April 30, 2014

Joseph Rail, P.E.
NAVFAC Washington
1314 Harwood St. SE, Bldg. 212
Washington Navy Yard, DC 20374-5018

Subject: Draft Uniform Federal Policy-Sampling and Analysis Plan, Site 66 - Turkey Run Disposal Area Expanded Remedial Investigation.

Mr. Rail:

Thank you for the opportunity to review the subject document. EPA submits the following comments at this time.

EPA BTAG Comment 1: BTAG previously provided comments on the SLERA, however we have not received responses to these comments. The responses should be provided for review. BTAG expressed concern regarding screening out surface water as part of the SLERA based on the limited number of samples and procedures used. Additional surface water characterization and analysis may be required for the BERA.

EPA BTAG Comment 2: Executive Summary, on Page 6, states that the Screening Level Ecological Risk Assessment (SLERA), states that no site-related unacceptable ecological risks were identified for groundwater. Please clarify if the SLERA evaluated groundwater discharge to the hyporheic zone. In addition, since additional groundwater samples will be collected the results will need to be screened against ecological benchmarks. SAP Worksheet #10 indicates that groundwater samples collected downgradient of the site were impacted with pesticides and metals.

EPA BTAG Comment 3: Executive Summary, on page 6, also states that no additional evaluation of surface soil and ash will occur since they were fully characterized in the RI. Please indicate how surface soil PRGs will be determined for evaluation in the FS (i.e., indicate if screening level will values be used as PRGs). It does not appear that surface soil exposures will be further addressed in the BERA.

EPA BTAG Comment 4: SAP Worksheet #2, Section 6, lists organizational partners and their connection with the lead organization (DoD). Natural resource trustees (NRTs), NOAA and DOI, should be listed as the lead agency is required under CERCLA to coordinate with NRTs. This coordination is generally performed via coordination with the EPA BTAG.

EPA BTAG Comment 5: SAP Worksheet #10 indicates that sediments will be analyzed for Aroclor-1254. Sediments must at least be analyzed for total PCBs. It appears tissue samples will be analyzed for congeners, which is appropriate. A subset of the sediment samples should also be analyzed for congeners.

EPA BTAG Comment 6: SAP Worksheet #10 provides the list of measurement and assessment endpoints. The list of assessment endpoints should include survival, growth, and reproduction of fish, amphibians, and aquatic carnivorous mammals.

EPA BTAG Comment 7: Figure 8 shows the proposed sediment reference sample location. Please provide additional information to support this location including the potential for impact from on- site sources and/or historical sediment data from the area.

EPA BTAG Comment 8: Appendix A should provide the SOP for the 28 day sediment toxicity test.

If you have any questions, please contact me at 215-814-3378.

Sincerely,

A handwritten signature in black ink, appearing to read "John Burchette", written in a cursive style.

John Burchette
Remedial Project Manager

cc: Curtis Detore