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NSWC INDIAN HEAD  
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EMAIL AND ATTACHED U S EPA REGION III COMMENTS REGARDING THE RESPONSE  
TO COMMENTS ON THE DRAFT REMEDIAL INVESTIGATION REPORT AT UNEXPLODED  
EXPLODED 9 (UXO 9) NSWC INDIAN HEAD MD  
11/20/2014  
U S EPA REGION III PHILADELPHIA PA

## **Marrow, Monica/VBO**

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**From:** Kasim, Margaret/WDC  
**Sent:** Tuesday, December 09, 2014 10:47 AM  
**To:** Marrow, Monica/VBO  
**Subject:** FW: UXO 9 RTC on Draft RI Report  
**Attachments:** UXO 9 RTCs.pdf

Margaret

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**From:** Burchette, John [<mailto:Burchette.John@epa.gov>]  
**Sent:** Thursday, November 20, 2014 12:07 PM  
**To:** Kasim, Margaret/WDC; [joseph.rail@navy.mil](mailto:joseph.rail@navy.mil); [nicholas.carros@navy.mil](mailto:nicholas.carros@navy.mil); [curtis.detore@maryland.gov](mailto:curtis.detore@maryland.gov)  
**Subject:** RE: UXO 9 RTC on Draft RI Report

Attached are all EPA Comments on the RTCs.

**John Burchette(3HS11)**  
Remedial Project Manager  
NPL/BRAC/Federal Facilities Branch  
**U.S. Environmental Protection Agency**  
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Philadelphia, PA 19103-2029  
Phone: 215.814.3378  
Fax: 215.814.3001  
[burchette.john@epa.gov](mailto:burchette.john@epa.gov)

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**From:** [Margaret.Kasim@CH2M.com](mailto:Margaret.Kasim@CH2M.com) [<mailto:Margaret.Kasim@CH2M.com>]  
**Sent:** Wednesday, September 17, 2014 12:48 PM  
**To:** Burchette, John; [joseph.rail@navy.mil](mailto:joseph.rail@navy.mil); [nicholas.carros@navy.mil](mailto:nicholas.carros@navy.mil); [curtis.detore@maryland.gov](mailto:curtis.detore@maryland.gov)  
**Subject:** RE: UXO 9 RTC on Draft RI Report

John – I understand your concern. Are your technical folks ok with the responses to their comments? I want to make sure I address all of EPA's concern at the same time. Thanks.

Margaret

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**From:** Burchette, John [<mailto:Burchette.John@epa.gov>]  
**Sent:** Tuesday, September 16, 2014 2:51 PM  
**To:** Kasim, Margaret/WDC; [joseph.rail@navy.mil](mailto:joseph.rail@navy.mil); [nicholas.carros@navy.mil](mailto:nicholas.carros@navy.mil); [curtis.detore@maryland.gov](mailto:curtis.detore@maryland.gov)  
**Subject:** RE: UXO 9 RTC on Draft RI Report

Hey guys,

I guess the primary issue I'm having with this site is I don't agree with No Action for the site. No Action could allow for a day care to be built at the site and with risks exceeding 10-4, this is unacceptable. Also I'm curious as to what statute would exempt the contaminants from CERCLA(see below). Certainly the grains were a release and the railroad is abandoned. Additionally, the propellant grains need to be accounted for somehow in soil. Simply not analyzing them

and not accounting for them is not an adequate characterization or representation of site conditions. The actual site conditions include the propellant grains that human or ecological receptors can easily access. I checked with other RPMs including Bruce Beach and Steve Hirsh to see if I was being reasonable and they agreed with my assessment. Please let me know if you have any additional questions or follow-up. Would you still like to do the conference call?

***Response:** Constituents that exceeded risk criteria are not constituents of propellant grains; hence, are not CERCLA-related or site-related such that an NFA conclusion is warranted. As noted earlier for propellant grains, if the flame test indicates that the grains are ignitable, then alternatives will be evaluated in a feasibility study. If the flame test of the grains is negative for ignitability, then it is recommended that a public awareness program be established to inform workers and visitors that there are no hazards associated with the grains.*

**John Burchette(3HS11)**

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**From:** [Margaret.Kasim@CH2M.com](mailto:Margaret.Kasim@CH2M.com) [<mailto:Margaret.Kasim@CH2M.com>]

**Sent:** Sunday, August 24, 2014 12:17 PM

**To:** [joseph.rail@navy.mil](mailto:joseph.rail@navy.mil); [nicholas.carros@navy.mil](mailto:nicholas.carros@navy.mil); [curtis.detore@maryland.gov](mailto:curtis.detore@maryland.gov); Burchette, John

**Subject:** UXO 9 RTC on Draft RI Report

Team – The following files are attached for your review:

1. Responses to comments tech memo
2. Redlined text incorporating response changes
3. Revised Figures 2-1 and 4-11 based on comments
4. Revised Tables 4-1 and 4-3 based on comments
5. Revised Tables 6-3 and 6-4 based on comments. Tables 2s, 3s, 5s, 6s, 7s, and 9s in Appendix K were changed, but are not attached to this email. As there are many tables, they can be provided to your human health risk assessors if they need them for their review.
6. Revised Tables 7-9, 7-10, 7-11, 7-20, and a new 7-26 based on comments. Old Table 7-26 will now be new Table 7-27, but it is not attached as it was not revised.

I am still waiting to receive comments from Curtis, but with so many reviewers, I thought they can start reviewing the responses to their comments to expedite finalization of this document. Please let me know if you approve the responses or not. If anyone needs to have a con call to discuss the responses further, please let me know and I will set up a con call. Please get back to me by Sep 5 with a response.

Thanks.

**Margaret F. Kasim, Ph.D.**

Senior Project Manager/Engineering Geologist

Environment and Nuclear Market

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

November 20, 2014

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

Subject: UXO 9 RI RTCs.

Mr. Rail:

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

EPA RPM General Comment: EPA disagrees with the conclusion of NFA for the site and this conclusion is not supported by the data in the report. Risks were found to be exceeding EPA's acceptable range for residential use. At the very least, the site will require an LUC, which EPA considers to be an action. EPA agrees with the proposals in the 11/13/14 email to conduct a flame test on the propellant grains as well as completing a chemical analysis. This chemical data will be used to update the HHRA.

EPA Tox General Comment 1 - I stand by my original comment. No Further Action at this site is not justifiable.

EPA Tox General Comment 2 - I stand by my original comment. Hot spots of arsenic, lead and PAHs appear to be present in on-site soil. Irrespective of site-wide risks falling within the target risk range, hot spots need to be addressed in the report and, perhaps, by the remedy selection.

EPA Tox Specific Comment 2- I stand by my original comment. Background data do not support the conclusion of No Further Action for the site.

EPA Tox Specific Comment 4 - The response contends that elevated soil levels of arsenic (up to 530 mg/kg), lead (up to 800 mg/kg) and benzo(a)pyrene (up to 4760 ug/kg) are not site-related, but, rather, are associated with historical rail operations. This may be plausible and should be

explored, so that a defensible path-forward can be established. Perhaps a closer evaluation (and more detailed discussion) of the distribution of contamination will help support this position.

EPA BTAG: The response to BTAG comment 1 indicates that additional information is provided in new Section 9.2 regarding the rationale that the site risks are not related to a CERCLA release. BTAG acknowledges that the risks are from contaminants that may not be related to propellant grains. The document states that “They are probably a source of contamination associated with historical rail operations, railroad ties treated with arsenic and creosote solution for preservation, weed-control sprays containing arsenic, coal-fired steam engines, and leaks from oiling of the mechanical units on the cars. Lead and zinc in soil could likely be related to paint chips from the buildings.” There are several CERCLA release scenarios associated with these activities. The response to BTAG Comment 2 states that the team agreed not to sample the surface water and sediment in the drainage ditch because the intermittent water in the ditch is from storm water associated with Building P166 and its parking lot. If the drainage ditch is a historic or current migration pathway of contaminants from the site area, then samples should be collected as part of the nature and extent of contamination objective of an RI.

EPA BTAG: The response to BTAG comment 4 is tied to comment 1. If these unacceptable risks are not related to propellant grains, and even potentially CERCLA releases, please describe how they will be addressed as part of management actions.

EPA BTAG: The response to BTAG comment 5 provides the rationale for central tendency and average exposure concentrations. BTAG agrees with performing these evaluations, however maximum exposure evaluations must also be considered in risk management. Part of this risk management should include consideration of the likely potential for exposure at other sites/operable units at IHIRT. The uncertainty in exposure is not just limited to underestimation. This also applies to the response to BTAG comment 8.

EPA BTAG: The response to BTAG comment 7 provides additional information for the soil quality guidelines. These are not necessarily protective “screening values” but the site concentrations are significantly lower than the CCME values. However these values do not account for the other contaminants in the soil, especially metals and PAHs, and are not site specific. Specific toxicity and bioaccumulation testing of site soils and sediments should be considered to evaluate site specific impacts.

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

Sincerely,

A handwritten signature in black ink, appearing to read "John Burchette". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John Burchette  
Remedial Project Manager

cc: Curtis Detore