



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
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Ms. Caryl Romine  
Area Safety and Occupational Health Manager  
National Animal Disease Center  
United States Department of Agriculture  
Midwest Area Administrative Office  
1815 North University Street  
Peoria, IL 61604

Dear Ms. Romine:

The EPA has reviewed the Engineering Evaluation and Cost Analysis (EE/CA) for the USDA National Animal Disease Center (NADC) Site, dated July 15, 2002. The document was received in our office on July 16, 2002. Our comments on the document follow:

**GENERAL COMMENTS**

1. EPA supports the intent of this EE/CA - to remove all waste material and contaminated soils from the NADC mixed waste burial site and dispose of the wastes at a permitted off-site facility. USDA has authority under CERCLA and Executive Order 12580 to take such actions. EPA has remaining concerns with the content of this EE/CA, however, as outlined in the following comments. EPA and USDA should discuss how best to proceed in addressing these concerns.
2. There are statements included in the EE/CA that could be interpreted to indicate that the proposed removal has a broader scope than we believe intended. The EE/CA addresses waste and soil contamination at the mixed waste burial site. The EE/CA does not address groundwater at the mixed waste burial site, nor does it address other releases at the NADC site. The scope of the EE/CA should be clarified. EPA also requests that the USDA include in the EE/CA a commitment to address other releases of hazardous substances at the NADC, where appropriate.
3. During our July teleconference to discuss EPA comments on the December 2001 iteration of the EE/CA, we discussed the importance of including in the EE/CA an outline of the plan for transporting wastes from the NADC to the disposal facility, given the nature of the wastes and potential community concerns. USDA indicated that the EE/CA would be revised to provide this transportation plan in order to inform the public and address possible concerns in advance. We did not find this information included in the revised EE/CA.

4. Based on your project schedule of July 9, 2002, it is our understanding that, following the close of the public comment period on this EE/CA, the USDA will be submitting an Action Memorandum in early September. This will be followed by submittal of a Work Plan, which will serve a dual purpose as an NRC Decommissioning Plan. Ultimately, a Burial Site Closeout Report to document cleanup activities completed during the removal action would be submitted to EPA in November 2002. Please advise if our interpretation is incorrect.

### **SPECIFIC COMMENTS**

1. Page 5, paragraph 1 - The scope of the EE/CA should be clarified. The EE/CA refers to the "NADC waste site" frequently, however, the EE/CA addresses only the mixed waste burial site, which is only a part of the entire NADC where releases of hazardous substances may have occurred.
2. Page 8 - The text refers to the "selected" alternative. Since the EE/CA is pre-decisional, we suggest you revise to indicate a "proposed" or "preferred" alternative.
3. Page 9 paragraph 1 - The scope of the EE/CA should be clarified. We suggest that you include some of the information referenced in section 1.4, paragraph 2. The text could read something like...

"The NADC consists of a number of (10 or more?) different waste disposal areas (describe briefly), as described in the 1991 PA. This EE/CA addresses waste and soil contamination at the mixed waste burial site, which consists of..."

4. Page 10, paragraphs 1 and 2 - Much of this information is superfluous for purposes of the EE/CA. The EE/CA should indicate the location of the new facility relative to the mixed waste burial site and discuss the implications of the new facility on potential cleanup requirements.
5. Page 12, section 1.1.9 - In previous comments, EPA indicated that the EE/CA should identify municipal and private water supply wells near the NADC. The EE/CA does not identify the private wells near the site. This is important information regarding potentially exposed receptors and should be included.
6. Page 15, section 1.3, 3<sup>rd</sup> and 4<sup>th</sup> paragraphs - Please clarify in the text that Executive Order 12580 delegated authority to USDA to take CERCLA response actions when necessary at their facilities.

7. Page 16, section 1.4, 2<sup>nd</sup> paragraph - We believe it is misleading to indicate that “no Superfund related action is recommended” for the NADC site, based solely on the Preliminary Assessment. This statement should be deleted from the EE/CA. It would be appropriate to include a statement identifying other possible CERCLA releases at the NADC, in addition to the mixed waste burial site, and to include a commitment that the USDA intends to address any unacceptable threats arising from these releases with the consensus of the appropriate regulatory agencies.
8. Page 17, last paragraph - We suggest that the text clarify that soils and groundwater in the area believed impacted by the mixed waste burial site have been evaluated for all contaminants of concern (including rad) and that no hits above detection limits or preliminary remediation goals have been found.
9. Page 23, section 2.1 - The Risk Evaluation in the EE/CA has been significantly revised. We have a number of comments that should be considered:

The exposure assumption used in setting the PRGs should be clarified. The current and anticipated future land use should be stated in the text, and the appropriateness of the exposure assumptions relative to the current and future land use discussed. Since the exposure assumptions are apparently based on a residential land use, these are likely conservative/protective for current and future conditions at the NADC. This should be clearly demonstrated in the EE/CA.

CERCLA remediation goals for individual contaminants are typically set at the  $10^{-6}$  risk level. If so, the cumulative risk (sum of all constituents for all pathways) for the site would then be less than the required  $10^{-4}$  risk level. The PRGs for soils listed in Table 2-1 for the rad contaminants are set at risk levels between  $1 \times 10^{-5}$  to  $6 \times 10^{-5}$  for each of the contaminants evaluated. The cumulative risk via the soil pathway for these four contaminants slightly exceeds the  $10^{-4}$  threshold level, using RAGS SSLs as a benchmark. Since the risk evaluation here is based on a residential use scenario, and since exposures at the NADC may be different (potentially less exposure) than would be assumed in a residential use scenario, it may be appropriate to include industrial use screening SSLs for comparison also, to illustrate that the proposed cleanup criteria is protective under CERCLA. As a practical matter, we understand that the USDA anticipates that little waste has been released from the original disposal media in the mixed waste burial site. If data is available, it may be appropriate to include comparisons against background concentrations of the ROCs as well.

10. Table 2-2 - We suggest that you highlight the risk basis for the SSLs listed (residential,  $10^{-6}$  risk). Also, you indicate that since there is no toxicological information available for POPOP and PPO, you are conservatively applying toxicological benchmarks for benzene instead. While benzene is considered relatively toxic/carcinogenic, it's not clear whether it would be more or less toxic than POPOP or PPO. We agree that, in the absence of other information, it is appropriate to use benzene as a screening benchmark in this

instance. It is not clear that using benzene toxicological properties provides a more conservative estimate of potential risks associated with POPOP or PPO. Should significant residual POPOP or PPO be found during confirmation sampling following the proposed excavation, EPA and USDA should re-evaluate the respective PRGs to insure they are protective.

11. Page 26, section 3.1 - In responding to previous EPA comments, USDA indicated that a letter to the State of Iowa requesting ARARs would be transmitted. This section does not reflect that any such letter has been sent, or that State ARARs have been appropriately incorporated. Please clarify.

In paragraph 1 of this section, the EE/CA appears to imply that ARARs must be met only for sites on the NPL. ARARs must be met for all CERCLA actions irrespective of the NPL status of a site. The NPL is only used to identify CERCLA response priorities. For Federal Facilities, being listed on the NPL generates other requirements (in CERCLA Section 120).

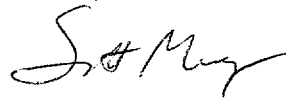
In paragraph 3 of this section, the EE/CA refers to the "preliminary identification of potential ARARs". The EE/CA and accompanying Action Memorandum for this removal need to affirmatively identify the appropriate ARARs.

12. Page 27, section 3.2 - This removal addresses only waste and soil contamination at the NADC mixed waste burial site. It does not address the entire NADC as noted here.
13. Page 27, section 3.3 - A number of the statements here are not truly RAOs - that is, they refer to how the action will be conducted more so than the objectives of the action itself. RAOs # 2, 3, and 5 are appropriately identified as RAOs. RAO #2 should be modified to address only soil, as air is not a pathway that is being evaluated in the EE/CA, and groundwater is beyond the scope of this EE/CA.
14. Page 28, section 3.4 - You may wish to revise this section to clarify that various wastes have been buried at the mixed waste burial site; that it is believed that those wastes remain contained in the original burial configurations; however, the nature of the containment is insufficient for long-term control. Should the proposed response action not be taken it is anticipated that waste believed contained in the burials will release to the environment at unacceptable levels and will create a difficult and costly situation to remediate.
15. Page 29, section 4.1, paragraph 3 - As previously noted, groundwater is beyond the scope of this EE/CA.
16. Page 31, section 4.1.4, paragraph 1 - We do not agree that previous assessments of groundwater are sufficient, or that the EE/CA adequately describes these assessments to conclude that groundwater is not impacted at the NADC mixed waste burial site.

17. Page 32, section 5.0 - In the first sentence, the EE/CA appears to state that the NCP requires that removal actions should meet unrestricted use criteria. This is inaccurate. This statement should be revised to indicate that an RAO for the NADC removal is to be protective for unrestricted use.
18. Page 34, section 5.3 - We suggest that much of the text be deleted. The last 2 sentences are the most relevant - Alternative 3 does not meet the RAO for future land use, and thus it will not be considered further.
19. Page 37, section 6.1.1 - We suggest that much of this discussion could be simplified/deleted. Alternative 4 is equally effective as Alternative 2. The differences between the 2 alternatives are in Implementability and Cost.
20. Page 41, section 6.2 - The time required to implement each alternative should be noted.

Please contact me at (913) 551-7131 so that we may discuss our comments, your plans for responding, and how best to proceed in a timely manner.

Sincerely,



Scott Marquess  
Project Manager  
Federal Facilities/Special Emphasis Branch  
Superfund Division

cc: Dan McGhee, IDPH  
Dan Cook, IDNR  
Mike Styvaert, OSC  
Sattar Lodhi, NRC Region I