

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Response to the National Remedy Review Board's Recommendations on the Jack's Creek Site **DATE:** 2/20/97

FROM: Thomas C. Voltaggio, Director
Hazardous Waste Management Division, Region III

TO: Bruce Means, Chair
National Remedy Review Board

Region III received the National Remedy Review Board (NRRB) advisory recommendations on the Draft Jack's Creek Site Proposed Remedial Action Plan (PRAP) in September, 1996. This memorandum documents the Region's response to the NRRB's recommendations regarding the Draft PRAP for the Jack's Creek Site.

The NRRB's recommendations have been included in the Administrative Record for the Site. The Region also has responded to several Freedom of Information Act (FOIA) requests for the NRRB's recommendations. The NRRB's recommendations were sent out to the public in response to these FOIA requests.

Region III also revised the Draft PRAP in order to incorporate the NRRB's recommendations into the Preferred Alternative. The most significant change in the revised PRAP was a significant increase in the contamination level requiring treatment for onsite soils. The treatment level in the revised PRAP is 40,000 parts per million (ppm), as compared to 10,000 ppm in the earlier draft. Soils having 40,000 ppm lead or greater are considered principal threat wastes at this Site. As stated in the Preamble to the NCP "EPA expects that treatment will be the preferred means by which to address the principal threats posed by a site wherever practicable. Principal threats are characterized as waste that cannot be reliably controlled in place, such as liquids, highly mobile materials (e.g. solvents), and high concentrations of toxic compounds (e.g., several orders of magnitude above levels that allow for unrestricted use and unlimited exposure.)" The justification for the 40,000 ppm lead treatment level is that it is exactly two orders of magnitude above the residential screening safe level of 400 ppm lead. The residential screening level is a level which would allow for unrestricted use and unlimited exposure.

This change in the treatment level reduces the estimated treatment volume from about 240,000 tons to approximately 15,000 tons. Largely because of this volume reduction, the Preferred Alternative in the Revised PRAP has a Present Net Worth of

\$12.5 million, as compared to the \$28 million cost of the Preferred Alternative in the Draft PRAP.

The NRRB also recommended that the Region use one of the recently developed adult lead exposure models to help establish a lead cleanup level for the Jack's Creek Site. Region III utilized the final draft (December, 1996) of the adult lead model published in the Report entitled "Recommendations of the Technical Review Workgroup for Lead for an Interim Approach to Assessing Risks Associated with Adult Exposures to Lead in Soil, Figures 1 and 2" to assist in the development of a site-specific lead cleanup level. This model predicts a soil cleanup level for lead in the range of 750 ppm to 1750 ppm for protection of pregnant female workers and their fetuses. A cleanup goal of 1000 ppm lead is approximately the midpoint of the protective range. Based on the results of this model, the 1000 ppm lead cleanup level in the Draft PRAP appears to be appropriate, and it was not altered in the Revised PRAP.

Deed restrictions on the Site property to permanently prevent the use of any onsite ground water as a drinking water source are still part of the Preferred Alternative. Similarly, future monitoring of the ground and surface water also still remains as an important component of the Preferred Alternative. No changes were made to either of these aspects of the remedy. However, the proposed wetland reconstruction, which was a component of the Preferred Alternative in the Draft PRAP, is not part of the Preferred Alternative in the revised PRAP. This deletion was recommended by the NRRB, and the Region felt it was an appropriate change to make to the Preferred Alternative.

The Jack's Creek Site was the first site in Region III to go before the NRRB, and it was certainly a great learning experience for all the Regional staff involved in the process. If you have any questions regarding this matter, please call me at 215-566-3125, or Garth Connor, the Remedial Project Manager for the Site, at 215-566-3209.