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Mr. Larry Fisher
BRAC Environmental Coordinator
Environmental Management Division
Tooele Army Depot
Tooele, Utah 84074-5000



RE: Final Risk Assessment Technical Memorandum,
Open Burning/Open Detonation Areas,
Fort Wingate Depot Activity, New Mexico
EPA I.D. # NM6213820974

Dear Mr. Fisher:

We have reviewed this report, dated September 15, 2000 and received October 23, 2000. We have these comments to submit:

Section 2.1.3.1, page 2-7: The report states here that surface water will not be considered in the risk assessment because the explosives are rapidly transformed by photolysis to other compounds. The given reference source (McGrath, 1995) listed a number of daughter products from the photolytic breakdown of explosives. These generated compounds include: nitrobenzenes, benzaldehydes, azoxydicarboxylic acids, nitrophenols, ammonia, formaldehyde, nitrate/nitrite, nitrous oxide, and N-nitrosomethylenediamine. The effects of such compounds in the seasonal water holes, which are described on page 4-3, need to be considered in the risk assessment.

The compound perchlorate has recently become a human health concern. It has been found in several OB/OD units across the country due to the composition of munitions and the nature of OB/OD operations. Currently only preliminary risk-based groundwater concentration values exist upon which to base a remedy decision. Sampling and analysis for perchlorate need to be done at the OB/OD Areas to determine the nature and extent of such contamination so that a risk-based decision can be made, based on knowledge of the entire set of potential risks involved.

Section 2.1.3.3, Contaminant Transport: The consideration of physical transport of contaminants by surface water via solution, traction, and turbid flow needs to be fully addressed and disclosed in the OB/OD risk assessment, not simply referenced to another document. As for the references, the Phase 1A and Phase

1B reports, we issued a number of concerns relevant to risk assessment in two comment letters dated March 14, 2000. So these documents are not very suitable as references. Further, the off-site transport of contaminants via groundwater needs to be addressed, but is not mentioned here.

Figure 2-4: This map shows the boundary of the OB/OD Area. Please note that at the north end there are 150-175 acres of land that were added to the OB/OD Area for possible use as a Corrective Action Management Unit (CAMU). Since the CAMU is no longer being considered, and the area is beyond the kickout boundary, the area should be removed from the OB/OD Area.

Section 3.0, Human Health Risk-Based Closure: This section should at least mention the human health risk present due to unexploded ordnance (UXO) and describe the manner in which it will be addressed. Please include information on how potential UXO remedial actions may affect the risk assessment.

Section 3.2.1, Ground Water Screening Criteria: Ground water contamination also needs to be screened against EPA Maximum Contaminant Levels (MCLs) for those constituents which have MCLs.

Section 3.2.1.1: Note that while Army may be able to control human use of ground water within the OB/OD Areas by retaining control of the property, Army will not have use control on ground water that flows out of the OB/OD Areas.

Section 3.3.1, Ground Water CPSs: The risk-based closure performance standards (CPSs) should not default to a carcinogenic risk at the 1×10^{-4} level, as we have stated in previous written comments. As noted in our March 14, 2000, comments on the Phase 1B report: "EPA has stated its policy on this issue (61 FR 19450, May 1, 1996):

EPA's preference, all things being equal, is to select remedies that are at the more protective end of the risk range. Therefore, program implementors and facility owners/operators should generally use 10^{-6} as a point of departure when developing site-specific media cleanup standards."

Therefore, the risk assessment report should submit risks that calculate in the range of 1×10^{-4} to 1×10^{-6} for regulatory review, with relevant arguments as to the specific circumstances which support your conclusions on the acceptability of the risks.

Tables 3-1 and 3-2: The 95th percentile is higher than the maximum value in several cases. This indicates a small sample size. The maximum should be used as the selected background in these instances.

Table 3-3: How can it be determined that the remediation worker will be on-site for 39.6 days for one year (8 hours/day for 120


days) when the specific remedial action to be performed has not been decided?

Table 3-3: In comments on previous Ft. Wingate risk documents, we explained that EPA has changed its policy on default absorption factors for inorganics and organics. EPA's support document for the Region 6 Medium-Specific Screening Levels can be used as a reference until the draft dermal guidance is released.

Table 4-4: The use of the maximum body weight for the robin is not conservative. What was the reasoning behind this risk assessment decision? Note that the average weight was used for the deer mouse.

If you have any questions on these comments, please call Chuck Hendrickson at (214)-665-2196 or send e-mail to him at hendrickson.charles@epa.gov.

Sincerely yours,


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