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Southern Wood Piedmont Co. (Wilmington)

**NCD 058 517 467
Immediate Removal**

Folders

1. General Correspondence

Three-Ring Binders

2. Additional DNAPL and Groundwater Delineation Supplemental Remedial Investigation: July 2003



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

November 24, 2003

Mr. Gregory B. Kuntz, P. G., Associate
Schnabel Engineering Associates, Inc.
104 Corporate Boulevard, Suite 410
W. Columbia, South Carolina 29169

Dear Mr. Kuntz,

The NC Superfund Section has reviewed your October 15, 2003 response to our comments on the July 31 2003 Additional DNAPL and Groundwater Delineation report on the SWP Wilmington Site. The Superfund Section has also evaluated responses to our comments on completion of Supplemental RI Risk Assessment to date.

Groundwater and DNAPL Issues:

Based on the October 15 response, the Superfund Section and SWP/Schnabel Engineering are in agreement that DNAPL and groundwater contaminant delineation is currently sufficient at the site. We have also discussed these findings with EPA Region IV. EPA noted a general concern that the Cape Fear River remains a potential receptor for site groundwater contaminants. The remainder of their comments were editorial in nature.

The Superfund Section agrees that recovery trenches could be instrumental in removal of DNAPL in the shallow aquifer, which apparently still contains the majority of free product present beneath the site. We look forward to hearing more about Schnabel's geophysical exploration capabilities and their potential applications at the site.

Completion of Risk Assessment:

Ms. Hanna Assefa, Industrial Hygienist with the NC Superfund Section, has previously exchanged detailed comments with Schnabel regarding the Supplemental RI's Human Health and Ecological Risk Assessments. SWP has addressed the majority of these comments, however, the scope of supplemental Risk Assessment to be completed remains a central issue.

file

Mr. Kuntz
November 24, 2003
Page 2

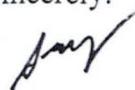
The original baseline HHRA and screening-level ERA were completed for SWP in 1996, prior to the EPA's 1997 Expanded Site Inspection. This HHRA/ERA was submitted (at SWP's initiative) to the NC Superfund Section as part of a Remedial Investigation report in 1999. In May 2000, SWP submitted its Supplemental Remedial Investigation workplan, including proposed additional Risk Assessment activities. Based on this workplan, the NC Superfund Section anticipated that the HHRA would consist of forward risk calculation (now incorporating the expanded data set) followed by calculation of Cleanup Goals for those compounds that exceeded acceptable risk levels. However, SWP instead submitted revised Cleanup Goal calculations based on 10^{-5} risk for each chemical, referring to the original (1996) Risk Assessment.

The 1995-1996 HHRA was completed prior to execution of the State Deferral Administrative Order between SWP and the NCDENR. Its scope of risk calculation would not be considered adequate if completed at present. However, in consideration of SWP's resource expenditures to date, Ms. Assefa conferred with EPA Region IV Risk Assessment personnel (see attachment) to determine under what circumstances EPA would accept the current HHRA configuration. The EPA representative indicated that a comprehensive risk recalculation would not be mandated in this case, provided that the current HHRA configuration remains protective of contaminant receptors. To this end, however, Cleanup Goal calculations for individual contaminants of concern must be completed based on 10^{-6} risk level, as per Ms. Assefa's comments.

Conclusion:

Based on the above discussions, the RI and incorporated Risk Assessments will soon be ready for collation and draft finalization. However, the Risk Assessments must address the attached comments from January 26, Jan 27 and October 14, 2003. In addition, the Superfund Section wishes to review the revised, 10^{-6} cleanup goals prior to draft finalization. If you have any questions, please contact Ms. Assefa or myself at 919-733-2801.

Sincerely,



Stuart F. Parker, Hydrogeologist
NC Superfund Section

Attachments

cc: Bill Arrants, Southern Wood Piedmont Co.
James Bateson
Information Repositories

October 14, 2003

Memorandum:

To: Stuart Parker
Hydrogeologist
Site Assessment and Remediation Branch

From: Hanna Assefa *HA*
Environmental Toxicologist
Inactive Hazardous Sites Branch

RE: Southern Wood Piedmont

I have consulted by telephone with Kevin Keporic risk assessor with the USEPA Region IV with regard to comment 14 on my January 17, 2003 memorandum to you. Kevin concurred that the proper procedure for an NPL site is to conduct a risk assessment based on the chemicals of potential concern followed by an RGO calculation. However, he also stated that he would be comfortable making an occasional exception to the procedure under certain circumstances, if doing so does not result in under protection of receptors from toxic chemicals.

Therefore, since the consultant has already proceeded in doing the RGO calculation first (the 1995 risk assessment is not acceptable) I recommend the consultant submit the revised RGO calculation with the necessary changes incorporated.

January 27, 2003

Memorandum:

To: Stuart Parker
Hydrogeologist
Site Assessment and Remediation Branch

From: Hanna Assefa *HHA*
Environmental Toxicologist
Inactive Hazardous Sites Branch

RE: Southern Wood Piedmont
Human Health and Ecological Risk Assessment

I have reviewed the response to my review comments for the October 2001 Human Health and Ecological Risk Assessment by AMEC Earth and Environmental. The following are my comments to the responses.

Human Health Risk Assessment

- Response 3: Explain why these samples were chosen.
- Response 8: Calculate site specific RBC's using 1E-06 target risk for all class A,B,C carcinogens.
- Response 9: North Carolina Surface Water Standards have to be met.
- Response 10: USEPA does provide a methodology to evaluate the inhalation of particulates for the construction worker scenario in the March 2001, Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites. Why is the approach you have taken more appropriate for this site? If you consider it more appropriate then address the following:
1. Provide references for using the PM10 value to calculate acceptable concentrations in the inhalation of particulates pathway.
 2. It appears that the PM10 value chosen for the construction worker would be higher than for a utility worker.
 3. The exposure factors tables for the construction worker scenario shows an inhalation rate of 1.6 m³/hr it is not clear where this has been incorporated in the soil HBCL.
 4. It is also not clear what the 1 hour stands for in the soil HBCL calculation. Please clarify both the write up of the inhalation exposure pathway for both the utility worker and construction worker.
 5. Make appropriate changes to the exposure assumption tables.

Response 14: The 1995 baseline human health risk assessment was not based on the same data set as the Supplemental Human Health Risk Evaluation. Some of the exposure pathways were not the same. The advantages of a forward risk calculation are that it provides a total risk estimate based on an reasonable maximum exposure (RME). Remediation goals would only be calculated for those chemicals that cause the total risk to exceed acceptable levels.

Ecological Risk Assessment

Response 7: Some chemicals bioaccumulate in fish more than in insects because they store in muscle and fat. However, insects tend to be much more closer to the contaminated sediment and could potentially have high levels of contaminants. If the COPEC's at the site likely accumulate more in fish than in insects please explain in the writeup and provide references. Otherwise evaluate insectivorous birds as a measurement endpoint. Why would fish eating birds be more important than insect eating birds?

Division of Water Quality
- Aquatic Toxicology Unit

January 6, 2003

- 2963

MEMORANDUM

To: Stuart Parker
Superfund Section, DWM

Through: Matt Matthews *mm*
Supervisor, Aquatic Toxicology Unit, DWQ

From: Sandy Mort *SM*
Environmental Biologist, Aquatic Toxicology Unit, DWQ

Subject: Review of response to comments, Southern Wood Piedmont (Wilmington)
sediment toxicity report

ATU has reviewed the response to comments for the Southern Wood Piedmont remedial investigation sediment toxicity report. ATU recommends that the final report include descriptions of deviations from USEPA sediment toxicity procedures as specified in the most recent manual. (It is also recommended that for future work, deviations from USEPA protocols be specified and reviewed prior to initiation of the testing to insure compliance with standardized methods and suitability of any modifications to maintain sample and test integrity.) Brief explanation of the basis for the deviations should also be included. Any modifications that may impact test sensitivity or precision should be discussed in detail. Specific recommendations include:

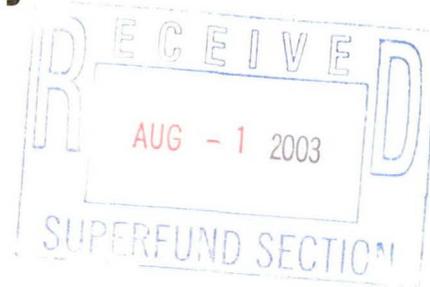
1. Include a description of sample collection and storage methods (depth of collection, equipment, number of sub-samples per composite, compositing procedures, temperature of storage).
2. Discuss the reduced number of replicates employed in the test relative to the number recommended by USEPA, and the potential impact on test sensitivity.
3. It was not clear if water renewals or slow introduction techniques were employed for this data set. If water renewal/introduction were used, describe the technique employed. If not used, provide a brief discussion to support this decision along with any other associated modifications or manipulations to maintain system viability. Discuss the use of aeration.
4. Specify the water type (preparation) used for overlying water in the test. Is this the same water used for reference toxicity tests?
5. Specify the method used to determine the growth dry weight endpoint (temperatures, drying time, data averaging).
6. Provide a reference toxicant cusum chart with re-calculation of control limits with each successive data point, as described by USEPA. Also, include the cusum chart for the previous reference toxicant (last 20 data points, control limits re-calculated with each data point) due to the recent change in toxicants and small number of data points with the current toxicant. Indicate any certifications the laboratory maintains for toxicity testing.

P.O. Box 5447
Spartanburg, S.C. 29304
Phone: (864) 599-1070
FAX: (864) 599-1087



Southern Wood Piedmont Company

July 30, 2003



Mr. Stuart F. Parker, Jr.
Hydrogeologist
North Carolina Superfund Section
Division of Waste Management
North Carolina Department of
Environment and Natural Resources
401 Oberlin Road, Suite 150
Raleigh, North Carolina 27605

Re: Administrative Order on Consent, Docket No. 97-SF-117
Additional DNAPL and Groundwater Delineation
Supplemental Remedial Investigation
NCD058517467
SWP-Wilmington Site

Dear Mr. Parker:

Please find enclosed an Additional DNAPL and Groundwater Delineation Supplemental Remedial Investigation for the Southern Wood Piedmont Company-Wilmington facility. This report is a follow-up to the October 30, 2001 Supplemental Remedial Investigation report. This report addresses your comments of August 6, 2002 and December 4, 2002, and follows the protocol of the January 21, 2003 Summary Proposal for Additional DNAPL and Groundwater Delineation Supplemental Remedial Investigation Workplan prepared by Schnabel Engineering Associates. The Workplan was approved in your letter of January 29, 2003.

The enclosed report was prepared by Schnabel Engineering and Associates, Inc., under the direction of Mr. Gregory B. Kuntz. Three copies of the report are enclosed.

If you have any questions or comments about the report, please contact me at 864-599-1070, extension 103 or Greg Kuntz at 803-796-6240.

Sincerely,

W. P. Arrants
General Manager

cc: G. B. Kuntz
Layton Bedsole, NCSPA