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

April 30, 2015

SUBJECT: New Kent Wood Preservatives, Inc., Providence Forge, Virginia

FROM: Bruce R. Pluta, Coordinator
Biological Technical Assistance Group

TO: Alizabeth Olhasso, Chief
Site Assessment and Non-NPL Federal Facilities Branch

Ruth Scharr, Federal On-Scene Coordinator
Eastern Response Branch (3HS31)

I have completed my review of the available site data, including the Draft Trip Report for the February 2015 Removal Assessment which is dated April 16, 2015. In summary, the data indicates that contamination that exceeds ecological screening levels (provided in the Draft Trip Report) is relatively confined to within the fenced site area, most notably associated with the drip pads and site drainage features which include one runoff channel draining to the north and three channels draining to the east. The data suggests that offsite contamination is limited to select hotspots within the aquatic system (stream and wetland complex).

The extent of contamination within two of the drainage features appears to be spatially bound. Contamination exceeding ecological screening levels was still noted at the most downgradient of the samples collected from the northern- and southern-most channel on the eastern side of the site. In spite of this limitation, samples collected further downgradient do not suggest widespread contamination at this time.

The available groundwater data does not indicate that ongoing or future contamination of the aquatic system is likely via this pathway.

Based on the levels and extent of contamination, there is potential for ecological risk to primarily avian and mammalian receptors from exposure to soils within the site and the noted drainage features. In my opinion the most prudent course of action would be the removal of soil contamination onsite and within the drainage channels. As site-specific ecological clean-up criteria cannot be generated with the available data, the use of the ecological soil screening values would be conservative alternatives.

Areas subject to removal should be backfilled with clean material which should be amended with up to 5% clean organic matter (such as composted yard material) to reduce the bioavailability of any residual contamination. Drainage channels impacted by any removal activities should be sloped at 3:1. Care should be taken to minimize activities in the wooded areas outside of the fence adjacent to the drainage channels as any negative impacts to this habitat will offset any benefits afforded by removal of the contamination. There should be not soil disturbance,

including compaction by heavy equipment, outside of the channels themselves.

Given the limited extent of contamination noted within the wetland / stream system, I do not believe removal or remedial actions are warranted. The impacts of any removal activities will be more detrimental to the system than any potential risk posed by the contamination that has been identified. It should be noted that given the nature of the system, it is expected that much of the contamination in the wetland sediments is not bioavailable and if site-specific cleanup values were to be generated for these sediments, they would likely be much higher than the current screening values.

In summary, contamination present at the site poses potential ecological risk. That risk is generally limited to onsite areas and several drainage channels with currently limited offsite migrations. Removal of soil contamination and backfilling with clean material will adequately address potential ecological risk and eliminate the potential for future migration of onsite contaminants into the aquatic system.

Thank you for the opportunity to provide support on this project. Please contact me at x2380 if you have questions or wish to discuss these recommendations.