Versar INC.

M E M O R A N D U M

TO:	Laura Casey	cc:	Jim Buchert Diane Sinkowski
FROM:	Ann Cyrus		11.1126.2000.001
DATE:	August 25, 2005		
SUBJECT:	Comments on the McCoy Field Wetland Restoration Project Response Document prepared by BETA Group, Inc. (August 15, 2005)		

General Comments:

Congener Analysis vs. Total PCBs (as Aroclor 1254)

It is agreed that the estimate of dioxin-like PCB congener concentrations, based on the original Aroclor 1254 composition profile, introduces a level of uncertainty into the analysis because the exact composition of the original commercial mixture is not defined and the original congener concentrations are likely to be modified over time due to site-specific conditions. With the current analysis limited to the evaluation of Aroclors, there is some uncertainty as to the actual concentrations of dioxin-like PCB congeners in site soil and the potential risks to ecological receptors from exposure to these compounds. The main concern would be if site processes such as weathering could result in concentrations of dioxin-like PCB congeners that when combined are similar to (or greater than) the 2,3,7,8-TCDD equivalent concentration that was estimated based on the congener profile for Aroclor 1254, which resulted in potential risks for certain ecological receptors. It is acknowledged, however, that proposed remediation at the site would reduce current PCB levels in soil by a factor of about 4 (as stated in the August 15, 2005 comment response document) which would reduce this potential risk.

As stated in the original comment document, congener-specific sampling and analysis is the best means to estimate the current concentrations of dioxin-like PCB congeners in site soil and determine the potential risk to ecological receptors from these compounds. If a congener specific analysis is not to be included in the report then the potential risk to ecological receptors from exposure to dioxin-like PCB congeners needs to be adequately addressed in the uncertainty section.

Specific Comments:

Response to Comment #8 (Note: this comment is identified as #7 in the August 15, 2005 comment response document, but this appears to be the response to the original comment #8).

8. Section 5.2.2.2 - Aquatic Invertebrates and evaluation of sediment pathway

It is understood that sediment benchmark concentrations may not be accurate to use in the analysis if they do not consider site-specific factors such as total organic content (TOC). It may be preferable, however, to use a modified sediment benchmark concentration (e.g., the equilibrium partitioning method) which accounts for TOC in sediment, rather than not including sediment exposure in the evaluation for aquatic invertebrates.

At this time, all other specific comments appear to be adequately addressed in the August 15, 2005 comment response document.