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LETTER REGARDING U S EPA REGION III COMMENTS ON THE DRAFT PROPOSED PLAN
FOR SOLID WASTE MANAGEMENT UNIT 1 AND SOLID WASTE MANAGEMENT UNIT 24
NAS OCEANA VA
3/30/2007
U S EPA REGION III

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

March 30, 2007

Mr. Timothy A Reisch
NAVFAC MIDLANT
HR IPT Environmental Restoration Section Head
9742 Maryland Avenue
Norfolk, VA 23511-3095

Subject: Proposed Plan for SWMUs 1 and 24

Dear Mr Reisch:

The EPA has reviewed the **Draft Proposed Plan for SWMU 1 and SWMU 24**, Naval Air Station Oceana, Virginia Beach, Virginia.

GENERAL COMMENTS

1. The draft Proposed Plan is in very good shape.
2. Please number all the pages.
3. Please replace "in situ" with "in-situ".
4. For SWMU 1, the EPA questions the propriety of assigning the LTM of a disposal pit to the state UST Program.

SPECIFIC COMMENTS

5. Page 1, Text Box 1. Please insert dates for the public comment period and the public meeting.
6. Page 2, Section 2.1, IAS Paragraph, fourth line. Please add ", mixed with hazardous waste oil, fuel, and solvents," after "contaminants"
7. Page 2, Section 2.1, Interim RFI Paragraph, fifth sentence. Please indicate how these contaminated sediments were handled.

8. Page 3, Section 2.1, Phase 1 RFI Paragraph, last sentence. Please add “waste oil and” before “petroleum-related”.
9. Page 3, Section 2.1, CMS Paragraph, second and third lines. Please add “waste oil and” before “petroleum”.
10. Page 3, Section 2.1, HHRA Paragraph. Please discuss the assessment and potential risk from exposure to benzene, toluene, and 1,1 DCA.
11. Page 3, FS Paragraph. Were any PRGs developed for benzene and/or 1,1 DCA?
12. Page 4, Section 2.1, Additional Groundwater Sampling Paragraphs. In the first paragraph, please delete the last sentence from this paragraph. This sentence should be included in the rationale of the Preferred Alternative. Also, in the first paragraph, please change the reference to Figure 2, but then provide a more detailed figure, like figure 2-4 in the decision document, to indicate the distribution of benzene, naphthalene, and floating product at SWMU 1. Also, please delete the second paragraph.
13. Page 5, Section 2.2, CMS Paragraph. Please add a new sentence, “For this study, residential use, MCLs, and beneficial reuse of the groundwater were not considered in developing cleanup goals.” after the fifth sentence.
14. Page 5, Section 2.2, Phase III RFI Paragraph. Did the report evaluate the leaching to groundwater SSL. Is there a potential for a residual source in the soil?
15. Page 6, Section 2.2, Additional Groundwater Sampling Paragraph. Please delete the fourth sentence in this paragraph. This sentence should be included in the rationale of the Preferred Alternative. Please include and reference a more detailed figure, like figure 1 in the Arsenic Technical Memo, which indicates all well locations and sampling results.
16. Page 7, Section 3, Only Paragraph. Please rewrite the third sentence to read “A **Decision Document (DD)** for SWMUs 2B, 2C, and 2E is scheduled for 2007.” Also, please delete the fourth and fifth sentences in this paragraph; this is not the right section to make these statements.
17. Page 7, Section 4.1, SWMU 1 subsection, last paragraph. In the fifth line, is the cancer risk that is reported for adults, children, or the combination?
18. Page 8, Section 4.1, SWMU 1 subsection, top paragraph. Please add a short discussion concerning potential risk from benzene and 1,1 DCA.
19. Page 8, Section 4.1, SWMU 1 subsection, second paragraph. Please indicate if any there were any MCL or Action Levels exceeded.
20. Page 9, Section 5, First Paragraph. Please delete all the sentences in this paragraph after the sentence that reads “There is no cost to implement this alternative.”

21. Page 9, Section 5, Second Paragraph. Please delete the second sentence.
22. Page 9, Section 6, Only Paragraph. Please fill in the dates for the public comment period and the Public meeting.
23. Page 10, Glossary, Background Concentrations. Please delete the last sentence.
24. Figures 2 and 3. Please replace these figures with more detailed figures as mentioned in earlier comments.

If you have any questions related to these comments or if I can provide any further assistance in clarifying specific issues please contact me at (215) 814-3364.

Sincerely,

Bruce W. Beach
Remedial Project Manager
Federal Facilities Section

cc: Steve Mihalko, VADEQ