

N69118.AR.001400
ST JULIENS CREEK
5090.3a

EMAIL AND U S NAVY RESPONSE TO COMMENTS FROM VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY REGARDING EXPANDED SITE INSPECTION REPORT
MUNITIONS RESPONSE PROGRAM AREA UNEXPLODED ORDNANCE 1 (UXO 1) ST
JULIENS CREEK ANNEX VA
4/17/2013
CH2M HILL

From: Janna.Staszak@CH2M.com [mailto:Janna.Staszak@CH2M.com]
Sent: Wednesday, April 17, 2013 5:09 PM
To: krista.parra@navy.mil; Doran, Karen (DEQ); Stroud.Robert@epa.gov
Cc: Adrienne.Jones@CH2M.com
Subject: FW: Area UXO 1 ESI - VDEQ comments

Team, the responses to the VDEQ comments are attached for your review. Also, I've included the "red lined" text and the tables and figures that have proposed changes as a result of the comments. Please let me know if these responses and changes are acceptable or if you have additional concerns.

Bob, will EPA be able to provide comments soon? Our goals update to Tier 2 has the final ESI report being submitted in May so we only have a few weeks left to resolve any comments that you have.

Thanks,

Janna Staszak, P.E.*
Project Manager
 CH2M HILL
 5701 Cleveland Street, Suite 200
 Virginia Beach, VA 23462
 Direct - 757.671.6256
 Fax - 703.376.5992
 Mobile - 757.268.6136
www.ch2mhill.com
 *Registered in Virginia and Maryland

From: Doran, Karen (DEQ) [mailto:Karen.Doran@deq.virginia.gov]
Sent: Monday, March 25, 2013 3:17 PM
To: Jones, Adrienne/VBO; Bob Stroud; Staszak, Janna/VBO; Krista Parra
Subject: Area UXO 1 ESI - VDEQ comments

Team –

Kyle Newman and I have reviewed the referenced document and submit the following VDEQ comments:

General Comments

1. Please indicate how the ecological risk PAL for 2,4,6-TNT of 0.13 was derived. It is not clarified in the SAP.
2. VDEQ does not agree that NFA is appropriate regarding MC for the site at this time. The three detections of TNT were localized at samples 8, 9, and 10 which included one exceedance of the PAL and another detection just under it. Since sampling was performed by collecting sediment from debris extracted from the river floor, it is difficult to know if these sediment data are representative of surface or subsurface conditions at the site. Given the localized detections around Wharf 1, there is significant potential for a more significant release than what has been detected. VDEQ requests additional characterization of the sediments surrounding Wharf 1 to determine if a release has occurred.

Specific Comments

3. Section 2.1 – Can more information be provided about the specific site and its setting? Only three sentences of this section refer to this site specifically while the rest is focused on SJCA as a whole. General information such as site acreage, estimated volume of ordnance that went through the wharfs in question, etc. and any gaps in knowledge about the site history should be identified.
4. Figure 2-5 – The intent of the "Location 4" label on this figure is not clear.
5. Section 4.5, first bullet – Did the partnering team approve of the location modifications? Please indicate this in the text since there were no sampling locations adjacent to the northern wharf near the "Magnetic Anomaly Concentration Areas" depicted in Figure 2-3 and there appears to be a data gap.
6. Section 4.5, page 4-3, last bullet: It is unclear as to how this bullet represents a deviation from the Work Plan or provides any relevant information to the investigation. Please remove this bullet.
7. Section 5: Please include a discussion evaluating the investigation's ability to meet the DQOs identified in the SAP.

Thank you for the opportunity to comment.

Karen M. Doran

Technical Reviewer
Federal Facilities Program
Department of Environmental Quality
629 East Main Street
Richmond, VA 23219
phone - 804.698.4594
karen.doran@deg.virginia.gov