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LETTER REPLYING TO DRAFT FINAL ASSESSMENT SITE INVESTIGATION FOR LIGHTER
AIR CUSHION VEHICLE 30 TON (LACV-30) MAINTENANCE FACILITY WETLANDS AREA
FORT STORY VA
4/22/1992
COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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COMMONWEALTH of VIRGINIA

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April 22, 1992

Joan VanDervort
Directorate of Engineering and Housing
Department of the Army
U.S. Army Transportation Center
Fort Eustis, VA 23604-5000

Re: Draft/Final Preliminary Assessment/Site Investigation LACV-30
Maintenance Facility Wetlands Area, Fort Story, Virginia

Dear Ms. VanDervort:

I am in receipt of the referenced document, dated March 19, 1992, and received at the Department on March 23, 1992. The document is very well prepared; however, the following questions arose during review of the document.

1. Page E-1 of the Executive Summary states, "low levels of organic compounds were found in site groundwater near the PN-49 Maintenance Facility (in MW-1403). This finding is an environmental concern because it could indicate solvent releases from the PN-49 Maintenance Facility. However, more data is needed to determine if this potential concern is real." However, on page 6-2 of the conclusions section it is stated that "the presence of solvent constituents in groundwater is a potential concern; however, the magnitude of these organic concentrations is not significant." Based upon this statement in the conclusion, it is unclear whether additional data will be collected as recommended in the Executive Summary, or whether the low levels of solvent contamination are going to be disregarded.
2. The information contained in the report does not describe the types of activities taking place at the LACV-30 site. It is therefore difficult to determine what potential sources for contamination exist. For example, a maintenance facility is said to be located at the site. However, the report does not describe what types of maintenance activities are taking place. The report mentions on page 1-2 that the site has two

maintenance buildings, with associated waste management structures. But it does not state what, if any, hazardous materials are used at the site, where these materials are stored, what wastes (hazardous and solid) are generated and where they are stored.

3. On page 1-4 it is stated that a literature search was performed to evaluate existing data. However, it does not state whether a literature search to determine past practices at the site was conducted. Past practices could have resulted in contaminated areas not currently being assessed.
4. Page 2-1 states that analytical soil samples were collected from each soil boring and submitted to the laboratory for analysis of volatile organic compounds, base/neutral/acid extractable compounds, metals, TFH-H and pesticide/PCBs. Were any wastes ever stored or hazardous materials utilized which contain constituents that would not fit into any of these categories for analysis?
5. Table 3-1 indicates which analyses were performed on which samples. Based upon this table, it appears that PCB/pesticide analysis was not performed on samples of groundwater. Why is this the case?
6. DDE, DDT and Dieldrin did not have trigger levels established, according to page 4-2, because background levels of these pesticides in the soil can be expected due to their use in soil based upon the CERCLA exclusion for properly applied pesticides found in CERCLA 104(a)(3)(D). However, any contamination that did not result from proper application would not be excluded. Therefore, it must be established that the pesticide contamination did not come from sources other than proper application. Were these compounds otherwise used on site other than for routine spraying? Where were the raw materials and waste materials generated from their use stored at the site? Do samples taken from the vicinity of these storage areas exhibit higher levels of contamination than other areas of the site?
7. Please explain why, as stated on page 4-3, background samples taken are considered background relative to the Ft. Story installation, but not necessarily to the LACV-30 site. If this is the case, site-specific background samples should be obtained and analyzed.
8. Page 4-11 of the report states that dissolved metals results will be referred to when assessing the significance of groundwater contamination relative to MCLs or VGWPL. It has been the Department's position, with agreement from the State Water Control Board, that significance of contamination in

groundwater should be based on both total metals levels and on metals levels found in filtered samples. If future uses of the groundwater involve development of wells (which would act to filter the groundwater), the analysis based on filtered samples would represent developed well water. However, sites without well development would require analysis of total metals levels found in unfiltered groundwater samples. As such, information elsewhere in the report regarding significance of metals contamination in the groundwater has not been reviewed. Please note that surface water standards are based on dissolved metals levels rather than total metals levels.

9. Page 5-9 of the report begins the explanation of areas of concern. A blueprint or drawing of drainage, sewage lines, and underground storage tanks would be helpful. Are there any connections of the drainage system to the hazardous materials/hazardous waste storage areas?
10. Page 5-9 describes Area No. 5, and states that flow from the outfalls feeds a sprinkler system located along the Beach Access Road. Were any soil samples taken from the sprinkler field?
11. It is stated on page 6-1 that isolated organic levels (toluene) do not indicate a solvent source at the LACV-30 site. However, toluene is not naturally occurring in the soil. If the source is not the LACV-30 site, then from where did the contamination come?
12. Page 6-2 states that benzene, 1,1-dichloroethene, m,p-xylenes and o-xylene were all found at concentrations below trigger levels. However, these compounds were found in amounts in excess of EPA MCLs, but they do not "trigger" further investigation. Is this advisable?
13. Page 6-2 states that TFH-H exceeding the trigger level were detected at SW-1454, but that this is not unusual considering the nature of operations at PN-49 grit basin. However, Appendix A states that the purpose of the sampling location at SW-1454 is to provide an indication of whether grit basin overflow may be contamination surface water. How can this be determined if contaminant levels exceeding trigger levels are discounted as "not unusual considering the nature of operations?"
14. Page 6-2 states that cadmium and mercury were detected at the site at levels above the Method Reporting Level, but that it does not appear that there is a problem with excessive cadmium contamination in the sediments. What about mercury? Also, how do the levels detected compare to the background levels

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established?

Based upon the above, our most pressing comment regarding the report is the use of filtered groundwater samples to determine contamination.

If you have any questions regarding the above comments, please feel free to contact me at (804) 225-2906.

Sincerely,



Lisa A. Ellis
Federal Facilities Program
Remedial Project Engineer

cc: K.C. Das
Erica Dameron