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LETTER OFFERING COMMENTS ON DRAFT DECISION DOCUMENT FOR FIREFIGHTING TRAINING AREA AND AUTO CRAFT AREA FORT STORY VA
2/8/2003
COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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April 8, 2003

Ms. Joanne Bateman
Remedial Project Manager
U.S. Army Transportation Center
ATZF-PWE, Building 1407
Fort Eustis, VA 23604-5332

RE: Draft Decision Document
Firefighter Training Area and Auto Craft Area
Fort Story, Virginia

Dear Ms. Bateman:

After reviewing the Draft Decision Document for the Firefighter Training Area and the Auto Craft Building Area at Fort Story, I have the following comments. Where appropriate, I have referenced the page number and section related to the comments.

1. **Page 1-1**, Please insert the following section before Section 1.3 and after Section 1.2, **Assessment of the Site** and use the following standard language. When a No Action Decision is made, the following language is recommended "The lead agency has determined that no action is necessary to protect public health or welfare or the environment."

2. **Page 1-2, Authorizing Signatures**, for VDEQ, Please add **Robert J. Weld, Director, Office of Remediation Programs.**

3. **Page 2-1, Section 2.1: Site, Name, Location, and Description.**
The National Superfund database identification number (e.g., CERCLIS) needs to be included in this section. For your information, the EPA ID is VA6210020875, and the Virginia Dump number is VA-103. The source of cleanup monies should also be noted in this section (e.g., Defense Environmental Restoration Account).

4. **General.** Several of the RBCs listed as September 2001 values are incorrect. All changes should be made in the results tables and hazard assessment tables for each site. Also, there seems to be an inconsistency with adjusting the non-carcinogenic RBCs. Note that several detection limits are above the RBC criteria. The following tables should be corrected as shown, units are the same used in the report (ppb for organics, ppm for inorganics). Surrogates for mercury are methylmercury in sediment and mercuric chloride in soil and groundwater.

Table 2-3	**Industrial**	**Residential**	**Tap**
Xylenes	410,000,000	16,000,000	
Napthalene		160,000	
Aluminum	200,000		
Lead	1,000		
Nickel	4.100	160	

Table 2-5			
Acetone			61
Napthalene			0.65
Beryllium			7.3
Cadmium			1.8
Chromium			11
Copper			150
Thallium			0.26

Table 2-7		
Chrysene		87,000
Aluminum	200,000	
Lead	1,000	

Table 2-8 SOC should be changed to SVOC in the Parameters column.

5. **Page 2-5, Section 2.3: Community Participation:**
Please insert the dates of the public comment 30-day period when it is determined.

6. **Section 2.5 Site Characteristics:**
Are there any areas of archaeological or historical importance at the Site?

7. **Section 2.7.1, page 2-24, Cancer Risk:** The USEPA has established 1E-06 to 1E-04 as a target (or acceptable) risk range, not a remediation goal. A remediation goal is the level of the contaminant that must be met in order to ensure that cancer risks are within the target range. Also make this change in the Cancer Risk paragraph on page 2-35.

8. **Section 2.8, page 39:** The Draft RI was issued prior to August 2001 according to a comment letter from Mrs. Sharon Wilcox, the Redline/Strikeout in March 2002 and the Final in December 2002, a period over which the Region III Risk-Based Concentration Table was updated twice, with several major changes for VOCs. Note that ethylbenzene has been reclassified as a carcinogen for the inhalation pathway with a CSF_i=3.85E-03. This change occurred in April 2002 on the Region III RBC Table, although the Redline/Strikeout version of the RI Report was issued in March 2002. The final was not re-issued until December 2002, during which time this change could have been included in the report. Table 2-5- The detection of 47 ug/l in 4MW-2D generates an ILCR of 1.45E-03 when put through risk assessment calculations for adult residents with dermal contact, ingestion and inhalation exposure from the shower. In addition, the detection limit (5 ug/l) was greater than the RBC tap of 3.3 ug/l, which means there may be other detections that were not quantified. A discussion of this should be included, along with rationale as to why these changes do/do not affect the decision for no action.

9. **Page 2-36, VOC bullet:** The Federal MCL for chloroform (THM) is 80 ug/l as of 2002.

10. **Page 3-1:** There is no title for this section. Please include on this page "**Section XX Responsiveness Summary"** and include the information under this section that is on this page.

11. Note that for screening sediment and surface water samples, the RBC tap and RBC residential soil for non-carcinogens are not adjusted for an HQ=0.1 and the RBCs for carcinogens are multiplied by ten. A more conservative approach was used in this report, however this comment is for future reports.

Should you have any questions with regard to this review, please contact me at 804-698-4261.

Sincerely,

Tony Parnell

Tony Parnell
Remediation Project Officer
Office of Remediation Programs

CC: Durwood H. Willis: DEQ-ORP
Anthony K. Pace; Malcolm Pirnie, Inc.
Milton Johnston; DEQ-TRO
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