

N50092.AR.000160
JEB FORT STORY, VA
5090.3a

LETTER OFFERING COMMENTS ON 80TH DIVISION RESERVE SITE REMOVAL ACTION
FINAL REPORT FORT STORY VA
10/24/1995
COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



File: 6C.11
6D.11

0160

COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

Peter W. Schmidt
Director

P. O. Box 10009
Richmond, Virginia 23240-0009
(804) 762-4000

October 24, 1995

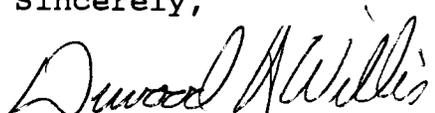
Commander
US Army Transportation Center
ATZF-PWE (Musel)
Building 1407, Room 111
Fort Eustis, Virginia 23604-5332

Dear Mr. Musel:

Thank you for providing the Department of Environmental Quality, Office of Federal Facility Restoration and Superfund, a copy of the "80th Division Removal Action, Fort Story, Virginia, Final Report".

Attached are comments from the staff concerning the final report. If you have any questions or comments please contact me at (804) 762-4192.

Sincerely,


Durwood H. Willis
Office of Federal
Facilities Restoration
and Superfund

Attachment

cc: Robert Stroud US EPA Region III (3HW71)
Erica S. Dameron, DEQ
Larry McBride, DEQ

Comments on "80th Division Removal Action
Fort Story, Virginia, Final Report"

Area A

The "80th Division LARC 60 Area Site Characterization Report", June 1994, indicates lead was found in several samples in the 0 - 2 foot level. The June 1994 site characterization report does not define the lateral extent of the lead contamination. Samples designated HA-8 and HA-7 are on the perimeter of Area A and these samples contain 356 ppm and 252 ppm lead respectively. Similarly, lead was found in the soil borings from two wells located outside Area A at 84.9 ppm and 86.5 ppm. The June 1994 report indicates the source of lead to be from sandblasting of lead based paint. A blasting operation may be subject to drift depending on wind and other conditions.

A more extensive characterization of potential lead contaminated areas seems appropriate considering the levels of lead detected. Please provide a rationale for limiting the investigation of lead to the present dimensions of Area A. Continued monitoring of groundwater for lead should be discussed.

Area B

Section 1 Page 2: It is noted that thirty tons of tetrachloroethene (PCE) contaminated soil were removed from area B. The data in Table 3 Closure/Disposal Samples Area B indicates concentrations of 24.9 ppm, 24.4 ppm and 7.64 ppm PCE in soil. (A composite sample of excavated soil contained 24.9 ppm PCE. Two samples from the bottom of the excavation, at the 1 foot and 3 foot 10 inch levels contained 7.64 ppm PCE and 24.4 ppm PCE respectively by TCLP analysis.) The US EPA Region III Risk Based Concentration (RBC) Tables indicate that a soil concentrations of tetrachloroethene (PCE) greater than 40 ppb would result in tetrachloroethene (TCE) partitioning in groundwater. The RBC Tables also indicate that trichloroethene in soil at concentrations greater than 20 ppb would partition in groundwater.

Data provided in the "80th Division LARC 60 Area Site Characterization Report", June 1994, indicated 5.3 ug/l trichloroethene and 158 ug/l tetrachloroethene in the groundwater at MW-4.

The concentration of TCE, 5.3 ppb, exceeds the maximum contaminant level of 5.0 ppb. The concentration of PCE exceeds the Groundwater Protection Level for PCE in Appendix 5.3 of the Solid Waste Management Regulation which 7.0 ppb as well as the maximum contaminant level for PCE which is 5.0 ppb.

TCE and PCE were identified in one well, MW-4 and were not identified at other well locations. Both TCE and PCE are dense nonaqueous phase liquids (DNAPLs) and are likely to move vertically as well as horizontally. This may result in non-detected compounds

Mr. Dan Musel
Fort Story
Page 2

in well samples surrounding MW-4. DNAPLs also have the ability to move in directions other than the direction of the groundwater gradient. This may account for PCE and TCE not being detected in MW-5 or MW-6 which are downgradient.

The evaluation of risk from Area B is difficult at this time due to limited characterization of the extent of contamination. Additional groundwater contamination characterization and soil characterization seem appropriate due to the existing data and the nature of the contaminants. In the interim as an investigation plan is being developed, will the existing groundwater wells be monitored?