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LETTER OFFERING COMMENTS ON FINAL REMEDIAL INVESTIGATION/ PUBLIC HEALTH
AND ENVIRONMENTAL ASSESSMENT REPORT FORT STORY VA
9/1/1993
COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

September 1, 1993

Mr. Steve McCall
U.S. Army Transportation Center
Fort Eustis, VA 23604-5332

Dear Mr. McCall:

The Department of Environmental Quality's Superfund Federal Facilities Program is in receipt of the *Final Remedial Investigation/Public Health and Environmental Assessment Report* for Fort Story, dated December, 1992. I have had the opportunity to review the document and have enclosed comments for your consideration. The comments on the *Draft Final Remedial Investigation/Public Health and Environmental Assessment Report* supplied by Lisa Ellis of the DEQ on July 17, 1992, and Robert Thomson of EPA Region III on July 8, 1992, should still be considered.

If you have any questions or would like to discuss these comments, please feel free to contact me at (804) 225-2909.

Sincerely,

Scott McMillian

Project Officer
Federal Facilities Program

- cc: K. C. Das
- Erica Dameron
- Lisa Ellis
- Michael Cochran (DEH - Fort Eustis)
- Robert Thomson (EPA Region III)

Enclosure

COMMENTS
"FINAL REMEDIAL INVESTIGATION/PUBLIC HEALTH AND
ENVIRONMENTAL ASSESSMENT REPORT FOR THE
REMEDIAL INVESTIGATION/FEASIBILITY STUDY"
FORT STORY

1. On page ES-2, it is stated that U. S. Army Environmental Hygiene Agency recommended restricting fishing in the pond until metals analyses in fish tissue could be sampled. It does not appear that fish tissue analysis was ever done. Please detail why tissue analysis was not completed. Also, it is not clear whether the pond is still used for fishing. Please detail any fishing activity that might be occurring at the pond. If fishing is restricted at the pond, proper posting of the restrictions should be made. Keep in mind that future changes in land usage, such as development of nature trails, will make the pond more accessible.
2. On page ES-2, it is stated that "total arsenic, total lead and total zinc were above ARARs in two monitoring wells located upgradient of Landfill 3". It is further stated that "concentrations of metal analytes detected in downgradient groundwater samples were below ARARs". The next sentence goes on to say that downgradient "concentrations were not significantly greater than the concentrations in the upgradient samples". This last sentence should be clarified since downgradient concentrations of total arsenic, total lead, and total zinc are stated to be lower than upgradient concentrations.
3. On page 1-2, section 1.3, it should be included that the demolished barracks in the Block 600 area were burned before disposal was made in the Landfill 3 area.
4. On page 2-1, section 2.1, it stated that monitoring well LF-4 was not sampled because JMM was not informed of its existence. In Section 2.1.4, it says LF-1 could not be located during the second round of measurements and therefore, has no data recorded in Table 2-2. Section 2.2 then goes on to state JMM sampled wells LF-1, LF-2, and LF-3. Please clarify whether it is LF-1 or LF-4 that could not be located and sampled, and maintain consistency within the document. We have assumed that it was LF-4 that was not sampled.
5. Please provide the rationale behind the locations of MW-201 and MW-202.
6. A topographic map should be included to accompany section 3.3.1.
7. Throughout the document, conclusions are made based on a southwestern

groundwater flow. It is stated within the document that groundwater flow could be altered by tides, for example. If this is true, some of the conclusions based on upgradient well analysis could be erroneous, especially since the upgradient monitoring wells are in very close proximity to the landfill according to Figure 2-1.

8. On page 7-10, section 7.6.1, it is stated that arsenic was not chosen as a contaminant of concern since it was found only once in a well which is upgradient of Landfill 3. As mentioned in the previous comment, this well is in such close proximity to the landfill that it may not represent upgradient groundwater concentrations. The concentration at LF-2 was 86ug/L, which is above risk-based concentrations according to EPA Region III's Risk-Based Concentration Table, Second Quarter 1993. Arsenic was also detected at three other monitoring wells. These findings seem to support that arsenic should be a contaminant of concern.
9. On page 7-14, section 7.6.2.1, it is stated that one production well was identified which serves as a contingency water source. What purposes would this water serve?
10. On page 7-14, section 7.6.2.2, it is stated that "available information indicates that the landfill was covered with clean soil at closure". Table 11 mentions that it is assumed to be two feet in depth. Where was this information obtained?
11. On page 8-2, section 8.1.1.3, it is concluded that impacts to wildlife are not likely. It appears that this conclusion is reached in part because "drinking water standards [for humans] are based on consumption of two liters of water per day over a 70-year lifetime; wildlife would have relatively limited intake of drinking water." This would likely not be a valid argument since an animal may drink considerably more (as a percentage of body weight) than humans.
12. This document states that no further investigation or remedial action is recommended for the landfill or the pond. The Department disagrees with this recommendation at this time. Further sampling and analysis should be performed before a no further action recommendation is made. The following comments provide the rationale for further monitoring.

While groundwater flow direction is not conclusive, it is believed to flow towards the southwest. If this is true, then there were no monitoring wells during this investigation which provided direct downgradient contaminant concentrations. LF-4 would provide more representative downgradient

concentrations. If LF-4 cannot be located or used, then a new well should be constructed.

Three surface water samples were taken around the landfill. These locations do not seem to be sufficient to determine any contamination that may be attributable to Landfill 3. Sediment samples should be taken at the surface water sample locations. Also, the canal located southwest of the landfill should be sampled as it would be more likely to receive contaminated groundwater than the pond.