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JEB FORT STORY, VA  
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LETTER REQUESTING CLARIFICATION ON SITE CHECK ADDENDUM BUILDING 1081  
10,000 GALLON WASTE OIL UNDERGROUND STORAGE TANK (UST) FORT STORY VA  
3/29/1995  
COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



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# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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March 29, 1995

FRANCIS L. DANIEL  
REGIONAL DIRECTOR

Commander  
U.S. Army Transportation Center  
Directorate of Public Works  
Attn: ATZR-EHE, Stephen A. McCall  
Chief, Environmental and Natural  
Resources Division  
Fort Eustis, Virginia 23604-5332

re: Facility/Location: Fort Story, Building 1081, 10,000 Gallon Waste Oil  
Underground Storage Tank (UST)  
DEQ Tracking Number: PC 90-1092

Dear Sir:

Thank you for providing the Department of Environmental Quality (DEQ) with the Site Check Addendum (Additional Data, dated February 20, 1995) for the above-referenced site. According to Barbara Hutcheson, of your staff, a work-plan will be developed within the next 60 days for remediation of petroleum contaminated soil at the former waste oil tank location. Once complete, please submit the work-plan for my review.

I am in need of clarification of a couple of items in the Site Check (SC) Addendum and the Initial Abatement Measures Report (IAMR). First, the consultant indicated in the SC Addendum that continuous soil samples were screened with a PID (at four locations) and a sample was collected from the material exhibiting the highest PID reading. In Table 1, the highest PID readings were listed at the deepest depths (7.9 to 12 feet). However, as noted in the footnotes, samples were collected at various depths (2.5 to 9.5 feet) and at shallower locations than those with the highest PID readings. Please clarify the following: Which samples had the highest PID readings; from what depths were these samples collected; and which samples were submitted for laboratory analysis?

Second, according to information in the IAMR, after the waste oil tank was removed, three samples were collected from the excavation (the excavation was 10 feet deep). Due to the high levels of contamination, 36,353 ppm to 62,823 ppm TPH, the consultant was directed to excavate an additional 3 feet from the sides and the bottom of the excavation. After the 3 feet was excavated, it would be assumed that the total depth of the excavation was approximately 13 feet. There is no indication in the IAMR that additional samples were collected from the bottom of the excavation (at 13 feet deep).

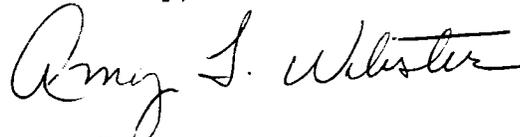
Commander  
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However, one could assume that the grossly contaminated soil between 10 and 13 feet was excavated and stockpiled. With this in mind, please justify further excavation at this site. I would recommend drilling one to two additional borings to 15 feet within the backfill area. The boring samples could be inspected and analyzed to determine if any additional saturated soil existed beneath the site.

Finally, it is my understanding that a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Remedial Investigation currently is underway at this site and should be complete this summer. The study will be addressing the dissolved phase contamination at the site. It is the preference of DEQ to wait until investigations of all phases of contamination are complete before approving corrective action of any one phase. Corrective action activities should be justified by the site, risk, and remediation assessments. Please comment on this matter.

Please submit your response to above-referenced items by May 1, 1995. If you have questions, you may contact me at (804) 552-1157.

Sincerely,



Amy T. Webster  
Geologist Senior  
Ground Water Section

cc: DEQ-OE&CA  
file ref. PC 90-1092