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LETTER OFFERING COMMENTS ON PRELIMINARY DRAFT REMEDIAL INVESTIGATION  
PRE-FEASIBILITY STUDY FORT STORY VA  
10/28/1991  
U.S. ARMY TRANSPORTATION CENTER FORT EUSTIS VA

TO: John Palensky  
From: Joan VanDervort  
Date: 28 Oct 91

**Subject: Comments Fort Story Preliminary Draft  
Remedial/Investigation Pre-Feasibility Study**

General Comments: I basically agree with the findings of the report. I don't think we have a significant problem with contamination. I do believe, though, that we need to tighten the report up in terms of ensuring **CLARITY** and completeness throughout. The report has a tendency to contradict itself in places. For instance, the report needs to state exactly what's happening in terms of hydrology, leachate flow direction, etc. (See specific comments below.) We also need to look at the potential of the Pond turning back into a full scale recreational fishing pond. (This is a real possibility) If it does, is the Recommendation still valid.

I noticed that the Recommendation did not include some kind of "closure" for the landfill. Is the report suggesting that we leave it as is? Do we have to follow the Va. State Solid Waste Management Regulations for closure? If we leave the landfill as is, are we asking for future problems because it's not capped. Is there some state requirement that we monitor the landfill? Does it make a difference if we leave all that rubble there?

1. p. ES-1 1st para. Please change tense of paragraph to past tense. When referring to the Landfill and the Pond, I think it is sufficient to address each as either "the Landfill" and "the Pond", once the official name and Site number are referenced. Is there any specific reason that the contract numbers are referenced?

Next to last sentence first paragraph. Delete "initially". Pond is still used for fishing. Last sentence delete "primarily".

GENERAL COMMENTS: I would rather not see a bullet list in an Executive Summary. I believe I stated in several earlier reviews that an Executive Summary needs to be directed toward command personal and interested parties that are not familiar with the technicalities of these reports. An executive summary should state the purpose of the study; how we got there; what was found; and where we're going. Use KISS.

2. p.3-2 (3.3.1.1) In describing the wooded wetland, need to emphasize that this wetland area is a small part of a larger wetland ecosystem which extends into Seashore State Park.

3. p. 3-3 (3.3.2) 2nd sentence...ref. Army agency or activity that performed work. (What work did they perform?)

(3.3.3) 1st para. This para. appears to imply that JMM did not correctly locate their own wells on a site location map. I hope that I am misinterpreting this. Who installed the well, it is not clear? I thought JMM found the exact location of the wells. Why did they state they don't know the locations of the wells when they took samples from them?

b) AEHA installed 4 wells, why wasn't LF-4 sampled?

c) Only MW 201, MW 202, and LF-1 through LF 4 are discussed. Where did EMW 7,8,and 9 come from on Figure 2-1. I cannot find any reference to them at the beginning of the report, except that JMM mislabelled some GW logs as EMW 7, 8, & 9. References to these wells are not made until much later in the report.

d) 3rd para. 1st sentence. Too long. In addition, change "most likely is occurring" to "is most likely occurring". How much is "some" GW discharge?

e) 4th para. 1st sentence delete MWs after groundwater.

4. p. 4-2. (4.1.1) Sediment ARARs. I believe the State Dept of Waste Management is going to feel very strongly about using the Interim Sediment Criteria Values for nonpolar Hydrophobic Organic Compounds. (EPA, 1987) unless someone can convince them otherwise. Has anybody checked with EPA or the Dept of Waste Management to see if the Interim Sediment Criteria have been expanded to include nonorganic compounds? Couldn't these be used as To-Be-Considered requirements?

b) If this para. is going to discuss ARARs for both soil and sediment it should be labelled as such. In addition, there seems to be a lack of transition between paragraphs 2 and 3. Para. 2 talks about Corrective Action Critieria for SMUs, states the standards for chromium VI and cyanide and then jumps to para.3 where the discussion falls to RCRA. There is no conclusion or appropriate summarization as to whether the referenced Corrective Action is appropriate or relevant.

c) Paragraphs 3 and 4 discuss RCRA requirements for TSD facilities. I don't know why these standards were even considered as potential ARARs since we are not a TSD facility and this is not a RCRA Corrective Action site.

5. (4.1.2) 1st para. The acetone detected in the surface water. Has it been absolutely concluded that this is **not** a lab contaminant.

b) 2nd para. Major considerations of interaction between GW and SW should include the wetlands area.

6. p.4-5. If Va Ambient Water Quality Criteria are enforcable why place EPA's Ambient Water Quality Criteria (which are

nonenforceable) ahead of VA's in terms of preference?

7. Why use 3.5 mg/l (phenol) instead of 1 ppb if Va. has the enforceable standard and EPA does not?

8. p. 5-1 (5.1.1) 1st para. Beginning with the second sentence, change to...Three monitoring wells (MW 7, 8, and 9) were installed by AEHA during this study. Their locations are located in Figure 5-1. For clarification purposes, these existing monitoring wells were redesignated by JMM as EMW 7, 8, and 9, but were not sampled as part of the RI. ....During the 1977 study, AEHA collected groundwater samples from each well. The analytical results are presented.....After reviewing the analytical results, AEHA **determined** that the upgradient wells (delete i.e.) **could not** .....

QUESTION: Why couldn't the Agency determine that the samples were not representative of water quality?

Did AEHA compare the sample results to MCLs or did JMM?

9. p. 5-2. General comment: Please review the 3rd para for proper present tense, past tense, past perfect, whatever, and be consistent. I think one of the reasons why it is difficult to determine whether or not the report is referring to AEHA or JMM is that the tenses are changing from past to present in the same paragraph.

10. p. 5-2. First para. The para. states that no VOCs, pesticides or PCBs were detected, how about metals?

11. p. 5-2 para. 2. Who suspected that construction of the landfill disturbed GW flow, JMM or AEHA?

12. p. 5-2 3rd para. Did JMM or AEHA collect the samples?

13. p. 5-2 3rd para. (middle) Sentence beginning with "**Although.....add**, AEHA felt the leachate had affected local groundwater."

14. p.5-2 last para. 4th sentence. change to "...to be slight and **of** no significant health of environmental hazard."

b) Did the AEHA 1987 report indicate why they wanted to resample when the first report indicated that there was not a problem? Did the report mention why they came back?

15. Last paragraph in (5.1.2) This paragraph should address the reason why an RI was developed for the site since AEHA said there was not a problem. Other than stating this, I don't see the necessity of reiterating the parameters of the RI, since it was already addressed earlier in the report.

16. p. 5-3 top of page... Statement that surface water samples were collected and contaminants believed to be surface water runoff or gw leachate....are we still not sure

about the source? I thought we were going to determine the source of the contamination.

17. p. 5-3. Statement concerning results from LF-1...I thought that you couldn't determine quality of background GW from these wells. In addition, I thought leachate was emanating from landfill in a radial direction. If so, are the upgradient wells truly upgradient. Please clarify.

18. p. 5-5 Surface water samples were collected from outside the perimeter of the landfill. Define perimeter....do you mean the approximate landfill boundary or the a "site boundary."

19. p. 5-5. (5.1.3.) There is a suggestion in this paragraph that there is a defined boundary between upgradient and downgradient. This is basically the same comment I made earlier concerning the reference to radial flow of leachate.

20. p. 7-2 Bottom of page. **Initial** should be capitalized.

21. p. 7-3 Environmental Setting. This section should mention the nearby location of Seashore State Park.

22. p. 7-23. 3rd para. 2nd to last sentence. Change designation to designated.

23. p. 8-3. Conclusions. Why wasn't the significance of acetone considered? I think the fact that you found acetone is highly unusual.

24. Summary and Recommendation. The summary includes a recommendation, but the recommendation only includes a statement of findings. Please correct.