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MEMORANDUM TRANSMITTING COMMENTS ON DRAFT REPORT REMEDIAL  
INVESTIGATION AND ECOLOGICAL RISK ASSESSMENTS REMEDIAL INVESTIGATION  
REPORT FIREFIGHTER TRAINING AREA, LIGHTER AMPHIBIOUS RESUPPLY CARGO  
(LARC) 60 MAINTENANCE AREA, AND AUTO CRAFT AREA FORT STORY V

1/10/1997

U.S. ARMY TRANSPORTATION CENTER FORT EUSTIS VA



DEPARTMENT OF THE ARMY

U. S. ARMY TRANSPORTATION CENTER

FORT EUSTIS, VIRGINIA 23604-5000

10 January 1997

File: 6C.10

REPLY TO  
ATTENTION OF:

ATZF-PWE

MEMORANDUM FOR Commander, US Army Corps of Engineers, Baltimore District,  
HTRW Branch, ATTN: CENAB-EH-HM (Myron Price), 10  
South Howard Street, Baltimore, Maryland 21201

SUBJECT: Comments to Draft Human Health and Ecological Risk Assessments  
Remedial Investigation Report, Fort Story, Virginia

1. Enclosed are my comments to the *Draft Report Remedial Investigation Human Health Risk Assessment* and *Draft Report Remedial Investigation Ecological Risk Assessment, Fort Story, Virginia*, dated September 1996. Please have Malcolm Pirnie address these comments. I would like the opportunity to review the final resolution of these comments before the final documents are prepared.

2. If you have any questions, please contact me at (757) 878-3817.

DANIEL S. MUSEL  
Remedial Project Manager

Encl

Copy Furnished:

Malcolm Pirnie, Tony Pace



## REVIEW COMMENTS

<b>DOCUMENT:</b>	<i>Draft Remedial Investigation, Human Health Risk Assessment, Fort Story, Virginia</i>		
<b>PREPARED BY:</b>	Malcolm Pirnie	<b>DATE OF DOCUMENT:</b>	September 1996
<b>PROJECT:</b>	Fire Training Area LARC 60 Maintenance Area Auto Craft Shop	<b>1383 NUMBER:</b>	STOS930001 STOS930004 STOS930006
<b>REVIEWED BY:</b>	Dan Musel, Fort Eustis	<b>DATE OF REVIEW:</b>	10 January 1997

NO.	SECTION	PAGE	PARA.	COMMENTS
1	6.2.5	6-25	1 <sup>st</sup> arrow	<u>FTA Site HHRA Summary and Conclusions:</u> Recommend restating the bullet to say "A summary of the Non-Carcinogenic Risk for future residential land use is provided below." This will further clarify it as future land use not current industrial use.
2	6.2.5	6-26	1 <sup>st</sup> arrow	<u>FTA Site HHRA Summary and Conclusions:</u> Recommend restating the bullet to say "A summary of the Carcinogenic Risk for future residential land use is provided below." This will further clarify it as future land use not current industrial use.
3	6.2.5	6-26	1 <sup>st</sup> bullet	<u>FTA Site HHRA Summary and Conclusions, Carcinogenic Risk:</u> In the last sentence of the 1 <sup>st</sup> bullet, recommend removing the words "the only adult exposure scenario".
4	6.2.5	6-26	2 <sup>nd</sup> bullet	<u>FTA Site HHRA Summary and Conclusions, Carcinogenic Risk:</u> In the last sentence of the 2 <sup>nd</sup> bullet, recommend rewriting the sentence to say "These child exposure scenarios are within the USEPA remediation goals."
5	6.2.5	6-26	2 <sup>nd</sup> arrow	<u>FTA Site HHRA Summary and Conclusions:</u> Remove the words "above acceptable criteria." This makes it sound like the risks for future residential development is acceptable.
6	6.2.5	6-26	last arrow	<u>FTA Site HHRA Summary and Conclusions:</u> Add the following sentence or other verbiage to further clarify the current risks. "However, under current land use, there are no risks from the metals in the groundwater."
7	6.3.2	6-35	3	<u>Future Land Use:</u> Rearrange the 1 <sup>st</sup> sentence to read as follows: "Although ... water, it is not expected the water would be consumed even if this drainage area was present after future residential development." This would make it read more clearly.
8	6.3.5	6-50	1 <sup>st</sup> arrow	<u>LARC 60 Site HHRA Summary and Conclusions, Non-Carcinogenic Risk:</u> Recommend restating the bullet to say "A summary of the Non-Carcinogenic Risk for future residential land use is provided below." This will further clarify it as future land use not current industrial use.
9	6.3.5	6-50	2 <sup>nd</sup> arrow	<u>LARC 60 Site HHRA Summary and Conclusions, Carcinogenic Risk:</u> Recommend restating the bullet to say "A summary of the Carcinogenic Risk for future residential land use is provided below." This will further clarify it as future land use not current industrial use.



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NO.	SECTION	PAGE	PARA.	COMMENTS
10	6.3.5	6-51	1 <sup>st</sup> arrow	<u>LARC 60 Site HHRA Summary and Conclusions:</u> Remove the words "above acceptable criteria." This makes it sounds like the risks for future residential development is acceptable.
11	6.3.5	6-51	last arrow	<u>LARC 60 Site HHRA Summary and Conclusions:</u> Add the following sentence or other verbiage to further clarify the current risks. "However, under current land use, there are no risks from the metals in the groundwater."
12	6.4.5	6-72	1 <sup>st</sup> arrow	<u>Auto Craft Site HHRA Summary and Conclusions, Non-Carcinogenic Risk:</u> Recommend restating the bullet to say "A summary of the Non-Carcinogenic Risk for future residential land use is provided below:" This will further clarify it as future land use not current industrial use.
13	6.4.5	6-73	1 <sup>st</sup> arrow	<u>Auto Craft Site HHRA Summary and Conclusions, Carcinogenic Risk:</u> Recommend restating the bullet to say "A summary of the Carcinogenic Risk for future residential land use is provided below:" This will further clarify it as future land use not current industrial use.
14	6.4.5	6-73	1 <sup>st</sup> bullet	<u>Auto Craft Site HHRA Summary and Conclusions, Carcinogenic Risk:</u> In the last sentence of the 1 <sup>st</sup> bullet, recommend removing the words "the only exposure scenario."



## REVIEW COMMENTS

<b>DOCUMENT:</b>	<i>Draft Remedial Investigation, Ecological Risk Assessment, Fort Story, Virginia</i>		
<b>PREPARED BY:</b>	Malcolm Pirnie	<b>DATE OF DOCUMENT:</b>	September 1996
<b>PROJECT:</b>	Fire Training Area LARC 60 Maintenance Area Auto Craft Shop	<b>1383 NUMBER:</b>	STOS930001 STOS930004 STOS930006
<b>REVIEWED BY:</b>	Dan Musel, Fort Eustis	<b>DATE OF REVIEW:</b>	9 January 1997

NO.	SECTION	PAGE	PARA.	COMMENTS
1	7.3	7-6	2	<u>Potential Stressors, Exposure Pathways and Ecological Effects:</u> VDEQ in the past has not excepted the use of regional soil data for background. Be prepared to back up the use of these regional values.
2	7.3	7-6	3	<u>Potential Stressors, Exposure Pathways and Ecological Effects:</u> Past experience with VDEQ has indicated they will not except the elimination of a contaminant by the comparison with background before the risk assessment is conducted. If a site is considered a hazard, then they will look at background concentrations and remove any contaminants at that time. Please be prepared to defend your method of deleting COPC by comparing them to background.
3	Table 7-6			<u>Site Specific and Regional Background Concentrations:</u> The text references the comparison to regional and site specific backgrounds concentrations for VOCs and PAHs. Please list these compounds and their respective values.
4	Tables 7-7, 7-8, 7-9, 7-10, 7-12			Include the regional and site specific values in these tables.
5	Table 7-13			Please shade a value for toluene and lead.
6	7.3.1	7-9	1	<u>Surface Soils:</u> The paragraph states there were several metals exceeding regional screening criteria and lack any screening criteria. However, the next sentence states they were consistent with site-specific and regional background levels and therefor not selected as COPC. This is confusing. Please clarify why they are greater then regional values in one sentence and consistent in another and not used as COPC.
7	7.3.1	7-9	1	<u>Sediment:</u> See comment #6. Values exceeded criteria but were consistent with background and were not used as COPC. Please clarify.
8	7.3.1	7.9	1	<u>Surface Water:</u> The paragraph indicates acetone was detected in two samples but at levels below regional criteria. Please indicate the regional criteria. Are the values background or some Virginia standard? Also include these values in Table 7-11.



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NO.	SECTION	PAGE	PARA.	COMMENTS
9	7.3.1	7-10	2	<u>Auto Craft Site:</u> Further clarify why Methyl ethyl ketone was not considered to be of concern beside just being detected in one sample at a low level. Say something like its chemical properties are such that make it not of concern.
10	7.8.1	7-20	2	<u>Hazard Quotients, FTA Site:</u> The HQ for lead and thallium for the White-footed Mouse was greater then 1 as indicated on Table 7-26. However, the paragraph indicates there is unlikely a risk. Please clarify.
11	7.8.1	7-20	2	<u>Hazard Quotients, Auto Craft Site:</u> The HQ for zinc was greater then 1 for the Killdeer and the White-footed Mouse (Table 7-27) but the text indicates there is no risk. Please clarify.