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JEB FORT STORY, VA
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CONFERENCE CALL NOTES, E-MAILS, AND COMMENTS REGARDING DRAFT DECISION
DOCUMENT LIGHTER AMPHIBIOUS RESUPPLY CARGO (LARC) 60 AREA FORT STORY
VA
6/18/2003
INSTALLATION RESTORATION PROGRAM FORT EUSTIS

18 June 08

file: 6c.19.b.

Conference Call - Larc 60 Draft Decision Document

Attendees: Wade Smith
Joanna Bateman
Tony Pace

Discussed when the next 2 sampling events are planned.

Wade will send the draft comments to Tony via e-mail after call (Wade provided a draft paper copy to me @ 11 June 08 meeting)

Wade asked:

2000 - Check on when & why sampling was conducted

- Tony believes this was when more wells were installed to define nature/extent.

if we sample 16 months apart we could get away w/ one report.

no sampling plan required / wells have been determined

- try to locate the lost well

if we agree on what we are analyzing for we have already agreed on which wells.

Need to specify semi annual on first sampling events and the

* Send Wade an email referencing our decision to sample 2 events annually (cc Tony)

Call from Wade - 19 Jun 08

if we exceed - MCLs on one of the
1st two events does it trigger a
five year review. (Ref. Part I section 1.5
of Draft DD)

if we have an exceedance - should
language be added to address the 5yr. review.

I called Tony and he agreed to add a disclaimer
that if an exceedance occurs a five year ~~year~~
review.

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Bateman, Joanna G Ms CIV USA IMCOM

From: Smith,Wade [wmsmith@deq.virginia.gov]
Sent: Tuesday, June 17, 2008 2:28 PM
To: Bateman, Joanna G Ms CIV USA IMCOM
Cc: Pace, Tony
Subject: RE: Fort Story: LARC 60 - Sampling Specification (UNCLASSIFIED)

Great!
I have reserved Meet Me # (804) 698-4504 from 11am to 12pm.
Thanks for the quick responses.
wade

-----Original Message-----

From: Bateman, Joanna G Ms CIV USA IMCOM [mailto:joanna.g.bateman@us.army.mil]
Sent: Tuesday, June 17, 2008 2:09 PM
To: Smith,Wade
Cc: Pace, Tony
Subject: RE: Fort Story: LARC 60 - Sampling Specification (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

I'm available tomorrow from 1100 to noon and anytime on Thursday.

Joanna G. Bateman
Environmental & Natural Resources Specialist U.S. Army Garrison
ATTN: IMNE-EUS-PW-E (Bateman)
1407 Washington Blvd.
Fort Eustis, Virginia 23604
(757)878-4123 ext. 303
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joanna.g.bateman@us.army.mil

Please tell us how we are doing through ICE.. Click on:
http://ice.disa.mil/index.cfm?fa=site&site_id=439

-----Original Message-----

From: Smith,Wade [mailto:wmsmith@deq.virginia.gov]
Sent: Tuesday, June 17, 2008 1:43 PM
To: Bateman, Joanna G Ms CIV USA IMCOM; Pace, Tony
Subject: Fort Story: LARC 60 - Sampling Specification

Good afternoon,

Could we schedule a call for tomorrow (6/18) or Thursday (6/19) and hopefully finalize the language associated with the next two rounds of sampling?

Please let me know your availability, it shouldn't take very long, maybe 15-20 minutes???

Thanks,

wade

Wade M. Smith

Remediation Project Manager

Virginia Department of Environmental Quality

Office of Remediation Programs

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wmsmith@deq.virginia.gov

Classification: UNCLASSIFIED

Caveats: NONE

Smith,Wade

From: Smith,Wade
Sent: Thursday, June 05, 2008 3:21 PM
To: Cutler,Jim
Cc: Willis,Durwood
Subject: RE: A few points re: W (for Monday meeting)

Thanks, I will be at Fort Eustis next Tuesday and Wednesday, so I can inquire about this issue while I am there. Please keep me updated.
wade

-----Original Message-----

From: Cutler,Jim
Sent: Thursday, June 05, 2008 3:19 PM
To: Smith,Wade
Cc: Willis,Durwood
Subject: FW: A few points re: W (for Monday meeting)

Wade,

Tungsten (replacement for lead in "green" ammunition) has reared its head as a potential emerging contaminant. Our ASTSWMO workgroup is preparing a status paper on the subject. I noticed that Ft. Eustis is listed below as a current user of this ammo. Not sure what will become of this but I will have more info. when I return from the ASTSWMO meeting next week. Anyways consider this a FYI for now.

Jim

-----Original Message-----

From: Garcia-Serrano, Millie (DEP) [mailto:Millie.Garcia-Serrano@state.ma.us]
Sent: Thursday, June 05, 2008 2:32 PM
To: Cutler,Jim; Mora-Applegate, Ligia; ANDREWS, STEPHANIE; Ruben Zamarripa; monica.sheets@state.co.us; Hendler.Harry@azdeq.gov; ligiamora@AOL.COM
Cc: Rodriguez, Dania; Garcia-Serrano, Millie (DEP); Begley, Mark (DEP)
Subject: A few points re: W (for Monday meeting)

Dear P&T FG friends,

It is my hope that this email finds you well. Unfortunately, I will not be able to join you all this coming Monday due to personal (child care issues) and unexpected workload commitments. Stephanie, our Vice-Chair, will run the meeting. You all know how she can whip us into shape...just like that! (Go Stephanie!) :

Anticipating my being unable to attend our FG meeting in person, I discussed with Dania (last week while in DC at the Fed Fac Subcommittee Mtg) and with Stephanie (today) the possibility of my participation over the phone. I have arranged my schedule to allow for this to happen, as well as conference call Mark Begley, Executive Director of the MMR Environmental Management Commission into the call as well.

By COB today, I will be providing you with a series of attachments that hopefully will serve to direct and better support our Tungsten Agenda item discussion next week. As a first pass, though, I thought it would be worthwhile to re-iterate two points that I believe played a critical role in the selection of our Tungsten Project - *a Second in the series of Emerging Contaminant Papers* authored by our Focus Group. As discussed in the past, and akin to the thought behind the development of the Perchlorate Paper, the Tungsten paper aims to serve as another policy deliberations tool when States feel compelled to explore the possibility to commence the standards promulgation process for a constituent, this time -- tungsten. Stay tuned for other follow-up materials that I will be issuing today.

Warm Regards,

6/9/2008

1. Tungsten & EPA's Integrated Risk Information System (IRIS):

Tungsten is being picked up by EPA's IRIS program (consideration for toxicity development). This action is a positive first step, meaning the IRIS folks think there is some merit and some potential that they'll be able to issue an agency approved assessment in some number of years down the road. The first step of the IRIS evaluation which is just beginning with this announcement is a call for data. As such MassDeP understands that EPA Region 1 has been in touch with Will McCain of CHPPM (Army Environmental Center research branch) and he has forwarded EPA Region 1 two files containing over 450 references he compiled on potential health effects of tungsten which I forwarded to the IRIS program on his behalf earlier today. EPA Region 1 hopes that this will open the dialogue between EPA and the Army on the subject of tungsten. MassDEP (Millie G-S) will follow up with Region 1 regarding obtaining the 450 references noted to the Department in the past.

2. Installations that Received Green Ammunition Shipments Across the Nation

The Army has shipped green ammunition to the following military bases during the past twenty-four months. A second list containing the names of those installations presently authorized to receive shipments because of short supplies follows.

Ft Drum, NY - Region 2
Ft AP Hill, VA - Region 3
Ft Carson, CO - Region 8
Ft Wainwright, AK - Region 10
Ft Richardson, AK - Region 10
Army Garrison, Lualualei, HI - Region 9
Aberdeen Proving Ground, MD - Region 3
Redstone Arsenal, AL - Region 4
Ft Eustis, VA - Region 3
Ft Stewart, GA - Region 4
Ft Campbell, KY - Region 4
Ft Sill, OK - Region 6
Ft Lewis, WA - Region 10
Ft Hunter Liggett, CA - Region 9
Ft Dix, NJ - Region 2
Homestead Air Force Base, FL - Region 4
Camp Edwards, MA - Region 1
Ft Benning GA - Region 4
Ft Indiantown Gap, PA - Region 3
Ft Rucker, AL - Region 4
Ft Leonard Wood, Mo - Region 7
McGregor Range, NM - Region 6
Ft Huachuca, AZ - Region 9
Ft Pickett, VA - Region 3
West Point Military Academy, NY - Region 2
Ft Knox, KY - Region 4
Camp Stanley, TX - Region 6
Ft McClelland, AL - Region 4
Point Salinas, PR - Region 2
US Property and Fiscal Office (USPFO), New Castle, DE - Region 3
USPFO, Providence, RI - Region 1
Department of Defense Supply Act, Hanover, MD - Region 3
Interstate Shellfish Sanitation Conference Property Mgt, Forest Park, GA - Region 4
Crane Army Ammunition Plant (AAP), IN - Region 5
USPFO, Phoenix, AZ - Region 9

Blue Grass Army Depot, KY - Region 4

McAlester AAP, OK - Region 6

USPFO, Edinburgh, IN - Region 5

Ft Irwin, CA - Region 9

Presently, green ammunition is only being shipped to the following locations because of limited supply.

Ft Richardson, AK - Region 10

Army Garrison, Lualualei, HI - Region 9

Ft Dix, NJ - Region 2

Ft Drum, NY - Region 2

Camp Edwards, MA - Region 1

Ft Eustis, VA - Region 3

Millie Garcia-Serrano

Deputy Regional Director - Bureau of Waste Site Cleanup

Massachusetts Department of Environmental Protection

Southeast Regional Office

20 Riverside Drive

Lakeville, Massachusetts 02347

Phone: 508-946-2727

Fax: 508-947-6557



DRAFT

COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.
Secretary of Natural Resources

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June 6, 2008

Joanna Bateman
Remedial Project Manager
Fort Eustis
U.S. Army Garrison
IMNE-EUS-PW-E (Bateman)
1407 Washington Boulevard
Fort Eustis, Virginia 23604-5306

**RE: Draft Decision Document
LARC 60 Maintenance Area
Fort Story, Virginia**

Dear Ms. Bateman:

The Virginia Department of Environmental Quality (DEQ) has received the *Draft Decision Document* (Decision Document) for the LARC 60 Maintenance Area site located at Fort Story, Virginia. The Decision Document, prepared by Malcolm Pirnie, Inc., was received by the DEQ (electronically) on October 23, 2007.

Thank you for providing the DEQ's Office of Remediation Programs the opportunity to review the above-referenced Decision Document. DEQ comments on the Decision Document were previously submitted to the Army from the Remediation Project Manager on December 21, 2007.

Subsequent to DEQ's Risk Assessor review, this office has the following comments:

General Comment:

1. The exposure assessment for this site changed between the original Remedial Investigation (RI) in 2002 and the RI Addendum in 2007. While the 2002 risk assessment evaluated a residential scenario and a drinking water scenario, the RI Addendum did not consider a future residential scenario or a drinking water scenario since these did not represent current or assumed near-term use.

DRAFT

Therefore, the No Further Action (NFA) decision in this Decision Document is only based on current land and water use assumptions. However, it should be noted that DEQ does not agree with this approach. If a residential exposure is not evaluated, DEQ expects that land use controls (LUCs) would be placed on the site to prevent future residential exposure. The alternative would be for the Army to evaluate a residential exposure and demonstrate that the LUCs are not needed. It is also DEQ Federal Facilities Restoration Program policy to return contaminated groundwater to levels consistent with unrestricted use (drinking water standards).

That being said, for the LARC 60 Maintenance Area site, the DEQ has enough information to conclude that a residential restriction would not be necessary based on soil contamination.

Per the attached *Revocation of the Draft Feasibility Study Report* letter dated May 30, 2008, the September 2007 Final Remedial Investigation Report Addendum recommended NFA for the LARC 60 site "based on the limited contamination detected in site groundwater and that no potential unacceptable human health or ecological risks were identified." This recommendation for NFA was approved by the DEQ "provided that two additional groundwater monitoring events were conducted after finalization of the Decision Document to verify that contaminants of concern remain below EPA maximum contaminant levels (MCLs)."

Assuming that the comments below on metals contamination in groundwater are addressed, the two additional rounds of groundwater sampling should provide enough information to determine whether additional action is warranted for groundwater.

Specific Comments:

2. Page 1-1, Section 1.3:

In addition to the volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs), metals have also been detected above Maximum Contaminant Levels (MCLs) and risk-based concentrations (RBCs) in groundwater. The RI calculated unacceptable hazard quotients (HQs) for iron and arsenic for a future drinking water scenario. The risk due to arsenic in a drinking water scenario also exceeded $1e-4$. Metals were not analyzed in the 2007 sampling event, so it is not clear whether there are still exceedances for metals. The follow-up sampling events should include metals analyses unless a sufficient rationale is presented to eliminate them.

3. Page 1-2, Section 1.5:

This section states that because this No Further Action remedy will not result in hazardous substances, pollutants, or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, a five-year review will not be required. However, this is inconsistent with subsequent sections of the document that state that if land use changes in the future, residential use would be re-evaluated.

DRAFT

4. Page 2-13, Section 2.5.3:

The site wide assessment of groundwater does not address the risks associated with metals in groundwater. The RI calculated unacceptable HQs for iron and arsenic for a future drinking water scenario. The risk due to arsenic in a drinking water scenario also exceeded $1e-4$. The risks due to metals were not addressed in the RI Addendum. The metals exceedances should be discussed in this section. The rationale for not addressing metals in the RI Addendum should be explained.

5. Page 2-16, Section 2.6:

This section states that the master plan for this site does not include base closure and that site use will remain industrial into the future. This section also states that residential use would be evaluated if site use changes in the future. This section should be expanded to discuss how the Army flags sites for future evaluation once a NFA decision is made.

6. Table 2-1:

The dates of the soil results should be included on this table.
The dates of the EPA RBCs should be noted since some of the criteria are out-of-date.

7. Table 2-5:

The dates of the groundwater results should be included on this table.
The two values that are presented for some of the groundwater results should be defined.
The dates of the EPA RBCs should be noted since some of the criteria are out-of-date.

8. Table 2-7:

The MCLs for Total Trihalomethanes should be 80 ug/L.

9. Table 2-8:

The RBC for trichloroethylene (TCE) has changed. The carcinogen class for TCE is incorrect. The most recent assessment for TCE (draft, 2001) classifies TCE as "highly likely to produce cancer in humans."

10. Table 2-12:

Note that some of the RBCs for soils have changed since 2001, including tetrachloroethylene (PCE), TCE, and the carcinogenic polycyclic aromatic hydrocarbons (PAHs).

Additional Comment:

11. DEQ review of this Decision Document does not preclude any future Natural Resource actions under CERCLA or OPA (43 CFR Part 11 and 15 CFR Part 990). As a Natural Resource Trustee, the Commonwealth of Virginia reserves the right to seek damages for injury or loss of the use of natural resources that may have been caused by a past release and/or an environmental cleanup of a CERCLA hazardous substance at this site. Note also that the DEQ did not solicit comments from other Trustee agencies at this time.

DRAFT

This letter is intended only as guidance and is not intended to be a case decision under the Virginia Administrative Process Act. If you would like to discuss this guidance, please contact me at (804) 698-4125 or wmsmith@deq.virginia.gov.

Sincerely,

Wade M. Smith
Remediation Project Manager
Office of Remediation Programs

Attachment: Revocation of the Draft Feasibility Study Report – May 30, 2008

cc: Pat McMurray, DEQ, CO

Smith,Wade

FYI

From: Willis,Durwood
Sent: Friday, June 06, 2008 11:56 AM
To: Smith,Wade
Cc: McMurray,Patricia
Subject: RE: Fort Story: LARC 60 - Revocation of Feasibility Study / Decision Document Response

When would the sampling be conducted?? is the sampling part of a larger program or just to confirm the data for this situation??

I just want to be sure that the samples are collected.

-----Original Message-----

From: Smith,Wade
Sent: Friday, June 06, 2008 10:58 AM
To: McMurray,Patricia
Cc: Willis,Durwood
Subject: Fort Story: LARC 60 - Revocation of Feasibility Study / Decision Document Response

Based on receipt of the attached Revocation letter, I have revised the Decision Document Response letter to include one additional paragraph (highlighted in yellow).
Please let me know if you concur/disagree with the revised wording.
Upon concurrence from you (and Durwood), I will submit the response letter to the Army.
Thanks,
wade

-----Original Message-----

From: Smith,Wade
Sent: Friday, May 09, 2008 2:24 PM
To: Willis,Durwood; McMurray,Patricia
Subject: Fort Story: Feasibility Study

Per discussion with Joanna, Malcolm Pirnie will submit a letter stating that the Feasibility Study (Draft 2005) never went final because the action changed.

Currently, the only reference to this is when the RI Report Addendum (Final 2007) states,
"The Final RI Report was completed in December 2002 and recommended a Feasibility Study to evaluate remedial alternatives for remediation of contaminated groundwater; however, several investigations have been conducted at the site since finalization of the RI Report, which have changed the recommended future action for the site. This Addendum summarizes those investigations and subsequent revised conclusions and recommendations."

Malcolm Pirnie's response is supposed to include some sort of response to Garwin's comments on the Draft FS.

I will keep you updated as things progress.
wade

-----Original Message-----

From: Unity Messaging System - CNTRLVM01
Sent: Wednesday, May 07, 2008 3:27 PM
To: Smith,Wade
Subject: Message from an unidentified caller (7578789020)