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LETTER AND COMMENTS FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
REGARDING DRAFT BENTHIC INVERTEBRATE SAMPLING WORK PLAN AND SAMPLING  
AND ANALYSIS PLAN SOLID WASTE MANAGEMENT UNITS 3 AND 7B JEB LITTLE CREEK

VA

08/10/2010

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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August 10, 2010

Mr. Bryan Peed  
NAVFAC Mid Atlantic  
9742 Maryland Avenue  
Code OPHREV4, Bldg. N-26, Rm.3300  
Norfolk, Virginia 23511-3095

Subject: Joint Expeditionary Base Little Creek – Fort Story  
*Draft SWMU 3 and SWMU 7b Benthic Invertebrate Sampling Work Plan and  
Sampling and Analysis Plan*

Dear Mr. Peed:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft SWMU 3 and SWMU 7b Benthic Invertebrate Sampling Work Plan and Sampling and Analysis Plan* dated July 2010. Based on this review the following comments are offered.

1. Executive Summary: Mercury is identified as a secondary COC at SWMU 3 and as a primary COC at SWMU 7b. The CERCLA release at each site was tied to former sandblasting activities. Mercury was used in marine paints as an anti-fouling agent. While we were unable to correlate the mercury concentrations with the ABM in the SWMU 3 RI, it's presence in the sediment around the harbor could be associated with the CERCLA release. And, since we are associating the mercury found at SWMU 7b with a CERCLA release it should be considered CERCLA related at SWMU 3 and should be considered a primary COC. Appropriate language could be developed via a conference call or during the next partnering meeting.  
The 2 paragraphs at the end of the Executive Summary should be placed under appropriate headings such as "Objectives" and "Content".
2. Worksheet 9-1, Overview: In the 4<sup>th</sup> sentence, please add an "h" to "tropic".
3. Worksheet 9-2, Overview: In the 2<sup>nd</sup> paragraph, please consider revising the opening of the 3<sup>rd</sup> sentence as follows, "*If necessary, AVS/SEM samples will be collected...*". Also, please correct the headings on pages of subsequent Worksheet 9-2's as they currently read 9-1. The "Date of Session" provided for Worksheet 9-1 and 9-2 is the same, is this correct? Also, is a Worksheet 9-3 needed to account for the April 2010 conference call project scoping session discussed in Worksheet 10-1, Project Objectives?

4. Worksheet 10-1, Site Description and History: In the 2<sup>nd</sup> paragraph, please revise the 4<sup>th</sup> sentence as follows, "In 1993, a catch basin *connected to a VPDES-permitted* outfall was constructed." In the 4<sup>th</sup> sentence please delete the word "water" and replace the word "at" with the word "via". In the 6<sup>th</sup> paragraph, please delete the parenthetical expression "(which are likely to have other contributing sources)" found in the 3<sup>rd</sup> sentence. Regarding the 3<sup>rd</sup> environmental question answered by this project, was the action item identified in Worksheet 9-2 resolved? What was the resolution? Should be discussed in the response to this question?
5. Worksheet 10-2, Site Description and History: Please add labels for Building CB-318 and Building 3869 to Figure 7. In the 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence, please insert the word "stormwater" prior to the word "outfalls". Are these outfalls permitted and sampled? If so or if not, please state this here. In the 3<sup>rd</sup> paragraph, please add the phrase "between the knee wall and the sheet pile" to the end of the 4<sup>th</sup> sentence. The end of the 4<sup>th</sup> paragraph needs more text providing the basis to risk manage the identified contaminants. Regarding the 3<sup>rd</sup> environmental question answered by this project, was the action item identified in Worksheet 9-2 resolved? What was the resolution? Should be discussed in the response to this question?
6. Worksheet 11-1: In the response to Question 1, please insert the term "indicator parameters" following the term "surface water quality" in the SWMU 3 and SWMU 7b responses. In the 1<sup>st</sup> sentence of the response to Question 3, it appears there are 2 sentences merged into 1. Please edit.
7. Worksheets 15-1, 15-2, and 15-3: Why are the PQLs listed in 15-2 and 15-3 different than those listed in 15-1 for the same chemicals?

This concludes VDEQ's comments concerning this document at this time. If you have any questions concerning these comments, please give me a call at (804) 698-4464.

Sincerely,



Paul E. Herman, P.E.  
Remediation Project Manager

cc: NABLC Tier 1 (electronic copy)  
NABLC Correspondence File  
Pat McMurray, VDEQ Waste Division-ORP (electronic copy)  
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