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LETTER AND U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY COMMENTS REGARDING DRAFT FINAL RECORD OF DECISION SITE 11A BUILDING 3033 JEB LITTLE CREEK VA
07/26/2011
CH2M HILL

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CH2MHILL

July 26, 2011

Virginia Department of Environmental Quality
Attn: Mr. Paul Herman, P.E.
629 Main Street, 4th Floor
Richmond, VA 23219

Subject: Response to VDEQ Comments on the
Draft Final Record of Decision, Site 11a: Building 3033 Former Vehicle Repair Facility and Waste Oil Tank
Joint Expeditionary Base (JEB) Little Creek-Fort Story, JEB Little Creek, Virginia Beach, Virginia
Navy CLEAN 1000, Contract N62470-08-D-1000, Task Order WE04

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments received from VDEQ on the *Draft Final Record of Decision, Site 11a: Building 3033 Former Vehicle Repair Facility and Waste Oil Tank, Joint Expeditionary Base Little Creek* (CH2M HILL, June 2011):

Comment 1: Section 1: Please revise the opening title of the 2nd sentence as follows, "Naval Amphibious Base (NAB) *Little Creek* (now referred to as JEB Little Creek)".

Response 1: The sentence has been revised.

Comment 2: Section 2.4: Please restate the acreage of the site in the 2nd sentence.

Response 2: The following sentence has been added following the 1st sentence of Section 2.4: "The Site 11a boundary encompasses approximately 7 acres." Additionally the reference to Site 11a was deleted from the 3rd sentence.

Comment 3: Section 2.6.1: The 4th paragraph lists the exposure scenarios evaluated during the human health risk assessment. The list of expsosure scenarios provided in the ROD correctly reflects those scenarios evaluated in the Remedial Investigation (RI) Report (July 2010) and the RI Addendum Report (February 2011). However, the Proposed Plan (PP) incorrectly lists the following hypothetical future exposure scenarios for soil and groundwater as having been evaluated; construction worker, industrial worker, trespasser, visitor, and adult or child resident. This discrepancy should be corrected in the PP following the close of the public notice period.

Please revise the last sentence of the 4th paragraph and the title of Table 3 to note only COC data is provided in the table. This should also be noted in the last sentence of the 1st paragraph in the Shallow Groundwater subsection.

In the Shallow Groundwater subsection, the cumulative values provided for future lifetime resident exposure to groundwater RME cancer risk (4.5×10^{-5}) and CTE cancer risk (2.2×10^{-4}) and future construction worker exposure to groundwater CTE non-cancer hazard (3.6) do not match their respective values listed in the Proposed Plan. Which is correct?

Response 3: Comment noted. The final version of the Proposed Plan will be revised to reflect the correct listing of the exposure scenarios evaluated during the human health risk assessment.

The last sentence of the 4th paragraph has been revised to read: "A summary of the site COC non-cancer hazards and cancer risks exceeding USEPA threshold levels in shallow groundwater is provided in Table 3." The title of Table 3 has been revised to "Summary of Unacceptable Human Health Risks associated with site COCs in Groundwater".

The cumulative value for future lifetime resident exposure to groundwater RME cancer risk has been revised to 4.5×10^{-3} in the ROD. The cumulative CTE cancer risk for future lifetime resident exposure to groundwater is 2.2×10^{-4}. The cumulative CTE non-cancer hazard for future construction worker exposure to groundwater is 3.6. Table 4 of the Proposed Plan will be revised following the public comment period.

Comment 4: Section 2.9.1: As discussed during the July 18-19, 2011 partnering meeting, please spell out the acronyms defining each alternative.

Response 4: The acronyms for each alternative have been spelled out.

Comment 5: Section 2.9.2: Does the ROD need to mention sustainability in its short-term effectiveness discussion similar to the way it is discussed in the Proposed Plan?

Response 5: The 3rd paragraph in the Short-term Effectiveness subsection has been revised to read: "Concerning sustainability Alternative 4 has higher energy consumption, green house gas emissions, and resource consumption than Alternatives 2 and 3 because it requires permanent installation of equipment (mechanical treatment equipment, polyvinyl chloride, or other plastic or metal piping, electrical conduits, etc.) and ongoing electrical energy input throughout its effective life to power the AS/SVE treatment system. Alternative 2 ranks slightly higher than Alternative 3 since the reagent used is a naturally derived material; therefore resulting in lower resource consumption."

Comment 6: Table A-6: Please add the Virginia Action-Specific ARAR 9 VAC 20-81-90 (A)(1). This Virginia ARAR was discussed during a June 2, 2011 conference call. At that time all parties agreed the subject ARAR was appropriate for inclusion in the feasibility study ARARs table and agreed it would be included in the ROD as a relevant and appropriate Action-Specific ARAR. This comment was discussed during the July 18-19 partnering meeting and the team agreed it belonged in the Table A-6.

Response 6: The Virginia Action-Specific ARAR 9 VAC 20-81-90 (A)(1) has been added to Table A-6.

The above response (and other Team comments/responses) will be incorporated into the final version of the Site 11a Record of Decision.

Please do not hesitate to contact me at 757-671-6280 if you have any questions concerning these responses.

Sincerely,

for

Nathaniel Price
Project Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Jeffrey Boylan/USEPA
Ms. Cecilia Landin/CH2M HILL
Administrative Record File