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NAB LITTLE CREEK  
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LETTER AND COMMENTS FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
REGARDING DRAFT FINAL RECORD OF DECISION FOR SITE 11A BUILDING 3033  
FORMER VEHICLE REPAIR FACILITY AND WASTE OIL TANK JEB LITTLE CREEK VA  
07/22/2011  
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY  
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July 22, 2011

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

Subject: Join Expeditionary Base Little Creek – Fort Story  
*Draft Final Record of Decision*  
*Site 11a, Building 3033 Former Vehicle Repair Facility and Waste Oil Tank*

Dear Mr. Peed:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft Final Record of Decision for IR Site 11a, Building 3033 Former Vehicle Repair Facility and Waste Oil Tank* dated June 2011. Based on this review the following comments are offered.

1. Section 1: Please revise the opening title of the 2<sup>nd</sup> sentence as follows, “Naval Amphibious Base (NAB) *Little Creek* (now referred to as JEB Little Creek)”.
2. Section 2.4: Please restate the acreage of the site in the 2<sup>nd</sup> sentence.
3. Section 2.6.1: The 4<sup>th</sup> paragraph lists the exposure scenarios evaluated during the human health risk assessment. The list of exposure 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 4<sup>th</sup> 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 1<sup>st</sup> 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 ( $4.5 \times 10^{-5}$ ) and CTE cancer risk ( $2.2 \times 10^{-4}$ ) 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?

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

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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.

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  
Michelle Hollis, VDEQ Waste Division-ORP (electronic copy)  
Milt Johnston, VDEQ-TRO (electronic copy)