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LETTER AND COMMENTS FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
REGARDING DRAFT REMEDIAL INVESTIGATION ADDENDUM REPORT FOR SITE 11A  
BUILDING 3033 JEB LITTLE CREEK VA  
11/10/2010  
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

TDD (804) 698-4021

www.deq.virginia.gov

Douglas W. Domenech  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4020  
1-800-592-5482

November 10, 2010

Mr. Bryan Peed  
NAVFAC MDLANT  
Code OPHREV4  
9742 Maryland Ave.  
Building N-26, Suite 3300  
Norfolk, Virginia 23511-3095

Subject: Joint Expeditionary Base Little Creek-Fort Story, Naval Amphibious Base Little Creek  
*Draft Remedial Investigation Addendum Report*  
*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 Remedial Investigation Addendum Report for Site 11a, Building 3033 Former Vehicle Repair Facility and Waste Oil Tank* dated September 2010. Based on this review the following comments are offered.

1. Section 2.2: Please add a new paragraph addressing how the site was identified during the Site 11 RI investigation.
2. Section 4.2: VDEQ's risk assessor could not complete a full evaluation of the conclusions presented in Section 6 as exposure parameters such as exposure duration and exposure point concentrations were not discussed in any detail in the report. Please include these and any other exposure parameters in an easily accessible table and insert all necessary text into Section 4.2.1 or elsewhere in Section 4.2 to support the data in the table. Also, please include the non-cancer hazard indices for all applicable constituents detected and discuss any non-cancer risks in relation to or in concert with the discussion of cancer risks especially if they overlap, i.e., a COI's non-cancer hazard outweighs its cancer risk.
3. Section 4.2.2: The table references are incorrect. Table 4-2 is associated with "Future Resident" and Table 4-3 with "Future Industrial Worker". Please correct.
4. Section 4.3.4: In the 1<sup>st</sup> paragraph, change "sublab" to "subslab".
5. Tables 4-9 and 4-10: Please insert the HIs for TCE even if it is below 1.0.

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6. Section 5.1: In the 2<sup>nd</sup> paragraph the slab thickness is 8 inches while Table 3-3 shows a slab thickness of 9 inches. Which is correct?
7. Section 6.2: Absent a UU/UE designation for the CERCLA site, shouldn't the recommendations also include discussion of a subslab vapor venting system in future buildings constructed on site? Also, the recommendations should include LTM of subslab vapor and/or indoor air to ensure the levels remain below risk screening levels.

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  
Kyle Newman, VDEQ Waste Division-ORP (electronic copy)  
Milt Johnston, VDEQ-TRO (electronic copy)