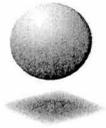


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LETTER AND THE U S NAVY RESPONSE TO U S EPA REGION III COMMENTS ON THE
DRAFT FINAL TECHNICAL MEMORANDUM POST-MILCON ACTION EVALUATION FOR
SOLID WASTE MANAGEMENT UNIT 7B (SWMU7B) SMALL BOATS SANDBLAST YARD
DESERT COVE NAB LITTLE CREEK VA

7/20/2012
CH2M HILL



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July 20, 2012

Environmental Protection Agency
Attn: Mr. Jeffrey Boylan
1650 Arch Street
Philadelphia, PA 19103

Subject: Response to EPA Comments on the *Draft Final Technical Memorandum, Post-MILCON Action Evaluation, SWMU 7b – Small Boats Sandblast Yard (Desert Cove)* Joint Expeditionary Base (JEB) Little Creek, Virginia Beach, Virginia Navy CLEAN 1000, Contract N62470-08-D-1000, Task Order WE32

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments received via email April 23, 2012, from EPA on the *Draft Final Technical Memorandum, Post-MILCON Action Evaluation, SWMU 7b – Small Boats Sandblast Yard (Desert Cove), Joint Expeditionary Base (JEB) Little Creek, Virginia Beach, Virginia* (CH2M HILL, February 2012):

Comment 1: On page 5, Section 5.1.2 indicates that the northern portion of Little Creek Cove was selected as a suitable background location (urban cove area unaffected by sandblasting activities) for the purpose of developing remediation goals for SWMU 3. The discussion implies in spite of the points mentioned, there are no concerns with the representativeness of the background data. BTAG has raised concerns about the suitability of this background location and does not believe that this associated uncertainty is adequately identified.

Please add some language regarding these uncertainties. The discussion also indicates that decisions were based on comparisons of site concentrations with maximum background concentrations only. Generally, consideration and discussion should also include mean concentrations, particularly given the nature of the data set. Thus, while the risk management decisions may not be impacted, conclusions that ecological risk is “not unacceptable” may not be as clear as implied.

Response 1: Discussion of the uncertainties associated with the use of these data in Attachment D, Section D.6 has been expanded. A consideration of mean background comparisons is included in the document through a comparison of mean background concentrations to mean site concentrations (see Attachment D, Tables D-17 and D-20).

Comment 2: Table 3 (Surface Sediment Analytical Data) shows an ER-L value of 3.4 mg/kg for tin. There is no ER-L value for tin. The TEL for tin is 48 parts per billion (ppb) [0.048

mg/kg] and the AET for tin is 3,400 ppb [3.4 mg/kg]. (Section 5.1.2 on page 5 also notes there is no TEL for tin.) In addition please clarify the footnote 1, and how it is used for the screening process in table D-3.

Response 2: Table 3 has been revised by adding a separate column for AET, clarifying the footnote, and including a row with the adjusted tin concentrations (used for the screening per footnote 1). Section 5.1.2 has also been clarified. Additionally, Attachment D Tables D-11, D-17, D-18, D-20, and D-21 have been updated to more clearly reflect the screening criteria.

Comment 3: Section 5.2.1 on page 6 states that the percentage of ABM present in sediment was visually estimated using a color index. A reference should be provided for this methodology or more specific information should be provided on how this method was performed.

Response 3: Text was revised to read, "A portion of the surface sediment samples from the interior of the Ponar dredge were placed in a disposable metal pan for homogenization. Following sample homogenization, the percent volume of ABM was visually estimated by decanting the fines and comparing the remaining material to the color index charts for estimating composition by volume (Compton, 1985)." This reference has also been added to the reference portion of the document.

Comment 4: Section 5.2.1 on page 6 states that all non-disposable equipment, such as the Ponar dredge, was rinsed with site water between sample locations. The same statement is made in Section 5.3.1 on page 8 states regarding the Phase 2 sampling. Because this sampling equipment did not undergo any decontamination procedure between samples, there is the potential for cross contamination. An explanation should be provided stating why decontamination was not performed and the potential for cross-contamination should be discussed.

Response 4: Text was added to indicate that samples were collected from the interior portion of the Ponar. This ensures cross-contamination did not occur since the collected samples did not come into contact with the sampling equipment. In addition, all visual sediment was washed from the equipment with site water.

Comment 5: Section 5.3.2 on page 10 states that a statistical evaluation of the 2010 benthic invertebrate survey data was conducted using ten benthic metrics. Please add language stating how and why these metrics were chosen; in particular whether these metrics represent endpoints that are sensitive to environmental contaminants and other environmental disturbance.

Response 5: As discussed in Appendix D, Section D.5.2, the final list of metrics was agreed to at the December 2010 partnering meeting with BTAG concurrence. The metrics were selected based on professional judgment and represent both "general" community metrics (such as number of taxa and total density) and more specific metrics relevant to the community at SWMU 7B (such as percent *Spionid* polychaetes and percent *Mediomastus* and *Capitella* polychaetes). Most of the metrics focused on evaluating pollution- and disturbance-related community factors (e.g., density of pollution sensitive organisms). This has been added to the text of Section 5.3.2 and Appendix D, Section D.5.2.

Comment 6: Section 6.0 on page 12 states that the available data suggest that some impacts to the benthic community are occurring in portions of the Pier Area mainly in the northeast corner of the Pier Area (sample locations LW07-M1, LW07-SD301, LW07-SD403, and LW07-SD404). BTAG agrees with this conclusion and recommends a feasibility study to develop remedial alternatives to address this impact to the benthic community.

Response 6: Comment noted. The partnering team has agreed to move forward with a feasibility study for the northeast corner of the Pier Area. No changes to the text have been made.

Comment 7: EPA recommends the final sentence of Section 6.0, "Whether or not the magnitude of the impacts, as determined by this evaluation, in the Pier Area meets the threshold of acceptability is a risk management decision" be deleted. Under CERCLA a risk management goal is to reduce risk to acceptable levels. Impact indicates that a risk threshold has been exceeded. In spite of the use of measures which lean towards presenting the lower end of the range of potential risk, areas of concern (i.e., potential risk) are still evident. A more protective evaluation may have identified additional areas.

Response 7: The sentence referenced in the comment has been deleted.

The above responses (and other Team comments/responses) will be incorporated into the final version of the technical memorandum.

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

Sincerely,



Nathaniel Price, P.E.
Project Manager

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