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U S NAVY RESPONSES TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
COMMENTS ON DRAFT TECHNICAL MEMORANDUM RISK ASSESSMENT UPDATE
VAPOR INTRUSION EVALUATION FOR SOLID WASTE MANAGEMENT UNIT 3 (SWMU 3)
PIER 10 SANDBLAST YARD JEB LITTLE CREEK VA
6/14/2013
CH2MHILL



CH2MHILL

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June 14, 2013

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

Subject: Responses to VDEQ Comments on the
*Draft Technical Memorandum Risk Assessment Update – Vapor Intrusion Evaluation,
Solid Waste Management Unit 3 – Pier 10 Sandblast Yard*
Joint Expeditionary Base Little Creek, Virginia Beach, Virginia
Navy CLEAN 1000, Contract N62470-08-D-1000, Contract Task Order 0062

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments from VDEQ received via .pdf mark-up on May 13, 2013 on the *Draft Technical Memorandum Risk Assessment Update – Vapor Intrusion Evaluation, Solid Waste Management Unit 3 – Pier 10 Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, April 2013):

Comment 1: Page 1, Conceptual Site Model, 3rd paragraph: How long has building 1263 been used as a repair shop? What types of repairs are done here? Are solvents used in the process and how have they been managed over its life as a repair shop? Add some more description here.

Response: A table as been added to summarize site building information.

Comment 2: Page 1, Conceptual Site Model, 3rd paragraph: How are buildings 1265, 1265-1 and 1265-3 and any other buildings within the SWMU 3 boundary used? Also, note building 1269 is a gazebo.

Response: A table as been added to summarize site building information.

Comment 3: Page 2, Conceptual Site Model, 6th paragraph, 4th sentence: This sentence requires a bit more supporting information surrounding the decision it presents in order to allow the reader to fully understand each agency position and justification.

Response: The 4th sentence was revised to read: "As part of a risk assessment update, the conceptual site model for SWMU 3 was updated (CH2M HILL, 2012) and the viability of the future potable use scenario as an applicable human health exposure pathway for groundwater at the site was evaluated. Based upon aquifer characteristics, the lack of potential downgradient users, and USEPA restriction against potable use of groundwater characterized as having a high-to-intermediate degree of interconnection with an adjacent surface water body, the Navy, in partnership with USEPA and VDEQ, agreed that potable use of groundwater (future residential and industrial worker) is not a viable exposure scenario for human health risk evaluation at SWMU 3."

Comment 4: Risk Management Considerations and Recommendations, 3rd bullet: Can we add some tables and graphs showing how the levels of VOCs changed from the 1998 SI to the 2002 RI to the 2007 SRI? Such depictions should add another line of evidence to support the no action recommendation by showing how the VOCs degraded/dispersed over time.

Response: A figure depicting SI, RI, and SRI data associated with PCE and its breakdown products has been added.

Please do not hesitate to contact me at 757-671-6239 if you have any questions concerning these responses.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Livingston', with a long horizontal line extending to the right.

David Livingston
Project Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Jeffrey Boylan/USEPA
Administrative Record File