

N61414.AR.002226  
JEB LITTLE CREEK  
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EMAIL AND THE VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY RESPONSE TO  
COMMENTS ON THE DRAFT RECORD OF DECISION SOLID WASTE MANAGEMENT UNIT  
3 (SWMU 3) PIER 10 SANDBLAST YARD JEB LITTLE CREEK VIRGINIA BEACH VA  
12/08/2014  
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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**From:** Herman, Paul (DEQ) <Paul.Herman@deq.virginia.gov>  
**Sent:** Monday, December 08, 2014 11:55 AM  
**To:** Boylan, Jeff; Landin, Cecilia/VBO; Price, Nathaniel/VBO; Peed, Bryan K. CIV NAVFAC MIDLANT Norfolk; Stepien, Matthew M CIV NAVFAC MIDLANT, EV  
**Cc:** Fritz, Frank  
**Subject:** RE: JEB Little Creek - Draft SWMU 3 ROD - EPA Comments

Team,

Regarding EPA's comments concerning the State ARARs addressing well abandonment, VDEQ requests no changes be made. When the monitoring wells to be abandoned are associated with a chlorinated solvent plume, the act of adding chlorine to the aquifer system via a monitoring well prior to abandonment seems counterproductive. For this reason, VDEQ typically excludes the chlorination component of the abandonment regulation when the regulation is cited for a site where a chlorinated solvent plume is present.

Please let me know if you have any questions or if further discussion is needed.

Thanks.

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**From:** Boylan, Jeff [mailto:Boylan.Jeffrey@epa.gov]  
**Sent:** Wednesday, November 26, 2014 3:05 PM  
**To:** <Cecilia.Landin@ch2m.com>; <Nathaniel.price@ch2m.com>; Boylan, Jeff; Peed, Bryan K. CIV NAVFAC MIDLANT Norfolk; Herman, Paul (DEQ); Stepien, Matthew M CIV NAVFAC MIDLANT, EV  
**Cc:** Fritz, Frank  
**Subject:** JEB Little Creek - Draft SWMU 3 ROD - EPA Comments

**Draft Record of Decision, SWMU 3 – Pier 10 Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia, November 2014**

Bryan/Matt,

- November 7, 2014 Email from CH2M HILL - Received electronic version of draft document for review and comment.

Email Action: EPA (RPM, Technical and Legal) has reviewed the subject document. There are no RPM and Technical (Tox and BTAG) comments, only legal. The following EPA legal comments are provided below and via attached track changes Word document.

ROD is in good shape. Main comments or things to look for:

- We don't have cleanup goals for PCE; 1,2 DCA or benzene, even though these are listed as COCs in Table 4, and remedies should address all COCs.
- Change signature to Cecil Rodrigues.
- Please add detail cost summary, as required by 1999 EPA ROD guidance, section 6.3.12(3) and highlights 6-28, -29, -30. Current draft omits 6-28, detailed costs, discount rate, total discounted O&M.
- Please add tables like Highlights 6-16B and 6-16B (toxicity assessment). Can be an appendix.
- Take care to include small changes marked in ARARs table.

Path Forward: Navy to respond to EPA legal comments.

**NOTE: No letter documenting EPA's legal comments on the subject document will be provided. EPA will begin the formal signature concurrence process once the final hardcopy version is signed and received by the Navy.**

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