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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Maria A. Pino, RPM
NPL/BRAC Federal Facilities Branch

Direct Dial: (215) 814-2181
Mail Code: 3HS11

Mr. Scott Park
NAVFAC Mid-Lant
9742 Maryland Avenue
Code EV3, Bldg N-26, Rm 3208
Norfolk, Virginia 23511-3095

January 17, 2006

Re: Review of draft Site Screening Assessment Closeout Report
SWMUs 5, 6, 13 and Site 6, Naval Amphibious Base Little Creek

Dear Mr. Park:

Thank you for giving the U.S. Environmental Protection Agency (EPA) the opportunity to comment on the U.S. Navy's (Navy's) draft *Site Screening Assessment Closeout Report, SWMUs 5, 6, 13 and Site 6, Naval Amphibious Base Little Creek, Virginia Beach, Virginia*. EPA has the following comment on the Navy's draft Site Screening Assessment (SSA) Closeout Report.

1. Section 3.1.1 states that, "Based on the absence of elevated constituents in the RRRS soil samples, the Navy, in partnership with the EPA and VDEQ, agreed that NFA was warranted for soils at the site." However, as shown in Table A-1 in Appendix A, one soil sample at Solid Waste Management Unit (SWMU) 5, sample LC13-S2, had an elevated concentration of benzo(a)pyrene, at 900 micrograms per kilogram ($\mu\text{g}/\text{kg}$). This concentration is greater than both the residential and industrial Risk Based Concentrations (RBCs) for benzo(a)pyrene, which are 87 $\mu\text{g}/\text{kg}$ and 390 $\mu\text{g}/\text{kg}$, respectively,. Please revise the SSA Closeout Report to explain that even though one soil sample contained an elevated concentration of one constituent, the Navy, EPA, and VDEQ determined that No Further Action (NFA) was warranted for soils at SWMU 5.
2. In Table A-4, all four groundwater sampling results appear to exceed the Maximum Contaminant Level (MCL) and background upper tolerance limit (UTL) for arsenic. However, only one sampling result, for sample LC14-W2, is highlighted in the table to indicate an exceedance of the screening criteria. Please revise Table A-4 to show that results for all four samples exceed the arsenic MCL and background UTL.



3. In Section 3.3.2, please explain how the sampling locations for SWMU 13 were chosen. This section states that the locations were based on "the location of Former Building 3170 and are shown on Figure 3-3." However, the sampling locations shown on Figure 3-3 are all beyond the boundary of SWMU 13.

If you have questions regarding these comments, please feel free to call me at (215) 814-2181, or you may e-mail me at pino.maria@epa.gov.

Sincerely,



Maria A. Pino, RPM
NPL/BRAC Federal Facilities Branch (3HS11)

cc: NABLC Tier 1 (electronic copy)