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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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May 29, 2003

Mrs. Dawn M. Hayes, P.E.
Code EV22DH
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Subject: Naval Amphibious Base Little Creek
Ecological Risk Assessment (ERA)
IR Site 8, Demolition Debris Landfill

Dear Mrs. Hayes:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft Ecological Risk Assessment (ERA) for IR Site 8, Demolition Debris Landfill* dated February 2003. Based on the VDEQ review we offer the following comments:

1. Table 2-6: Move the "Coastal Plain Slimy Salamander" listed in the "Frogs and Toads" section to the "Salamanders" section of the table.
2. Section 3.1.3.3, Page 3-5: Amphibians should be considered in this ERA as there may be possible exposure pathways and routes on Site 8. The freshwater canal leading from Lake Bradford is a permanent fresh water body adjacent to Site 8 that may provide sufficient habitat for amphibians. Also, the red-backed salamander listed in Table 2-6 is a terrestrial amphibian and does not have an aquatic larval stage. Please include amphibians as a possible receptor group given the presence of a fresh water source adjacent to the site and the possible presence of an amphibian that does not require fresh water during its larval stage.
3. Section 3.2.2: The fresh water canal leading from Lake Bradford does not lie within the boundaries of Site 8 and is not likely to be adversely impacted by the contaminants present at the site. However, it does offer a freshwater source to species that may be present on the site. Please amend the first paragraph of this section to address this viable freshwater drinking source.
4. Section 3.2.2: Certain prey species may be exposed to groundwater in the sediment layer. Groundwater flows up through the sediment into the surface water. Possible groundwater exposure pathways may exist at this interface and should be considered or properly discounted in this section.
5. Section 4.2.4.1: In the first paragraph, please clarify which metals and compounds detected in the upland areas were retained as PCOCs.
6. Section 4.2.5: Was mercury retained?
7. Table 4-6: The screening value for toxaphene should be 0.0002 µg/l as this is the chronic aquatic saltwater standard in Virginia.

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8. Table A-1: This table is missing the even numbered pages.

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)
Jennifer Jones, VDEQ
Durwood Willis, VDEQ