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

November 17, 2006

Mr. Scott Park, P.E.
NAVFAC Mid Atlantic
9742 Maryland Ave. Bldg N-26, Rm 3208
Norfolk, VA 23511-3095

Subject: Naval Amphibious Base Little Creek (NABLC)
Draft Record of Decision: Site 11 School of Music Plating Shop

Dear Mr. Park:

The Environmental Protection Agency Region III, Office of Federal Facility Remediation and Site Assessment, NPL/BRAC Federal Facilities Branch (3HS11) in conjunction with the Office of Technical and Administrative Support, Technical Support Branch (3HS41) has reviewed the *Draft Record of Decision: Site 11 School of Music Plating Shop* at NABLC. The following comments are offered:

1. According to the Baseline Risk Assessment, no direct contact threat is posed by soils at the site. The potential cancer risks associated with groundwater, however, are very high, with RME estimates in the high 10^{-2} range and CTE predictions not far behind in the high 10^{-3} range. While the draft ROD and proposed remedy seem to adequately address groundwater contamination at the site, the role of subsurface soil as a continuing source of groundwater contamination is not so clearly discussed. According to page 2-3 of the report, the pre-FS investigation conducted in 2005 revealed TCE in soil at up to 25,000 ug/kg. Although the primary source of VOC contamination at the site, the neutralization tank, associated piping, and neighboring surface and subsurface soils, was excavated in 1996, perhaps additional consideration should be given to excavating existing soils with high levels of VOCs. Removing highly contaminated soil will likely reduce the overall timeframe for groundwater remediation.

2. The MCL (80 ug/L) for chloroform (actually, total trihalomethanes) is based on the mandatory disinfection of public water supplies. This process usually involves chlorination, resulting in trihalomethane by-products. The excess cancer risk related to the MCL for this group of compounds is relatively high, in the 10^{-4} range, but worth the trade-off when the morbidity and mortality associated with ingestion of pathogenic microbes is considered. However, this MCL is not appropriate for

contaminated groundwater at SF (or similar) sites; rather, in these instances, a risk-based concentration should be established as the clean-up goal for chloroform. Note that at a cancer risk of 10^{-6}, the generic tap water RBC for chloroform is 0.15 ug/L. For this site, a remediation goal in the low ppb range should suffice.

Sincerely,

Jeffrey M. Boylan
Remedial Project Manager

Cc: NABLC Partnering Team (via e-mail)
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