

4/6/07-01210

CH2M HILL

5700 Cleveland Street

Suite 101

Virginia Beach, VA 23462

Tel 757.671.8311

Fax 757.497.6885



CH2MHILL

April 6, 2007

Mr. Jeffrey Boylan
NPL/BRAC
Federal Facilities Branch (3HS11)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Comment Summary, *Draft Technical Memorandum – Vapor Intrusion Study for IR Site 13, PCP Dip Tank and Wash Rack* at Naval Amphibious Base Little Creek, Virginia Beach, Virginia.

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL has prepared the following response to comments received from EPA on January 24, 2007 via electronic redline markup on the *Draft Technical Memorandum – Vapor Intrusion Study for IR Site 13, PCP Dip Tank and Wash Rack* at Naval Amphibious Base Little Creek, Virginia Beach, Virginia:

Comment Summary

Building 3165 Envelope Information

1. Include references to photographs.
2. Suggest having a separate paragraph describing the specific characteristics for each wing.
3. Please provide more detail to agree with Appendix A.
4. Figure 3 does not show any penetrations.
5. How many/area? (In reference to floor penetrations/cracks)
6. This sentence seems different than what is described in Appendix A.
7. Was the crack smoke tested? Appendix A indicates penetrations (conduits) were slightly depressurized.

HVAC System

1. Suggest having a separate paragraph incorporating the current descriptions of the HVAC system characteristics by each wing for clarity.

Conclusions from the September 2006 Site Visit

1. Suggest having a separate paragraph incorporating the conclusions by each wing for clarity.
2. What does this mean – office space?
3. Rewrite to say this was because of carpeting and/or vinyl tile.

Groundwater Sampling and Analysis

1. What was the outcome? Add a sentence to finish the thought.

Analytical Results

1. Delete this sentence; it is already stated in the section "Groundwater and Soil Sampling and Analysis".

Vapor Intrusion and Human Health Risk Evaluation

1. Suggest having a separate paragraph describing the exposure pathway identification by each wing for clarity.
2. Based on the building survey and HVAC systems, are ANSI/ASHRAE assumptions applicable? Can ACH be calculated for each wing using HVAC design and/or actual airflow with the building dimensions?
3. Acetone is the only output file presented, where are all the COCs?

Risk Assessment Results and Discussion

1. Suggest this section provide and discuss the results consistent with Johnson and Ettinger model scenarios that were run.

Conclusions

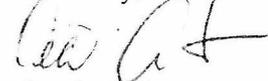
1. Suggest this section provide conclusions incorporating the model scenarios that were run. Some language could be provided to tie/bring the entire assessment to "a no concern for potential exposure the VI pathways" conclusion.

Response Summary

Based on Navy, EPA, and VDEQ discussions during the January 2007 Partnering meeting, significant changes to the document have been made as such a Draft Final Distribution is warranted. EPA comments on the draft version of the document were received and incorporated into the *Draft Final Technical Memorandum - Vapor Intrusion Study for IR Site 13, PCP Dip Tank and Wash Rack* for regulatory review.

If you have any questions concerning this comment summary, please feel free to contact me at (757) 671-8311 x426.

Sincerely,



Cecilia White,
Project Manager

cc: Mr. Paul Herman/VDEQ
Mr. Scott Park/ NAVFAC Mid Atlantic
Ms. Jamie Butler/CH2M HILL