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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Mrs. Dawn Hayes, P.E.
Naval Facilities Engineering Command
Atlantic Division Headquarters, Code EV22
6506 Hampton Blvd
Norfolk, VA 23508-1278

Subject: Naval Amphibious Base Little Creek
Field Site Screening Explanation of Results for Appendix B Sites – AOCs H, I, J, and Site 14

Dear Mrs. Hayes:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Field Site Screening Explanation of Results for Appendix B Sites – AOCs H, I, J, and Site 14* dated November 2003. Based on the VDEQ review we offer the following comments:

1. AOC J, Page 7, Subsurface Soil: The 2nd and 3rd sentences in the 1st paragraph refer to "surface" soil. Should this read "subsurface"?

2. AOC H, Page 9: This section indicates one surface and seven subsurface soil samples were collected. However, the "Field Activities" and "Data Evaluation" sections indicate four surface soil samples and four subsurface soil samples were collected at AOC H. Which is correct? Attachment A, Table A-1 includes data from all four samples and shows that at least one compound was detected in each sample. Please explain why Table 12 for AOC H (COPC selection table) only includes detections from SS-103 when Figure 8 and Table A-1 show four samples were collected.

3. AOC H, Page 12: The absence of comparable data for acetophenone prevented assessment of that chemical leading to uncertainty in the overall assessment of the site. What chemical and physical characteristics of this SVOC justify recommending "no further action" in the last paragraph? Please include this justification in this section.

4. Table 2 through 11: Please add a footnote to each to explain that "bolding" indicates a detection that exceeded the background UTL.

5. Tables 2, 3, 7, 8, 10 and 11: The industrial and residential soil RBCs for vanadium were changed on the October 2003 Region III RBC Table but were not updated in the exceedance tables. The new values are: industrial soil- 310 mg/kg and residential soil- 23 mg/kg.

6. Table 12: Please change the screening toxicity value for vanadium to 2.3 mg/kg. The other COPC tables have the correct value. Also, to be conservative, VDEQ uses the cadmium (water) RBC for screening all media.

7. Table 13, Footnote 4: VDEQ uses pyrene as the surrogate for acenaphthylene.

8. Table 19: Inorganics are not included in the table. Table A-6 clearly shows that inorganics were detected in Site 14 surface soil samples.

9. Table 20: Benzo(a)pyrene should be shaded since it was retained as a COPC.

10. Figure 11: Antimony also had exceedances at AOC J but is not shown in the figure. Please explain which exceedances the figures are supposed to be showing because arsenic was not retained as a COPC in AOC J subsurface soils due to background comparison. Antimony was retained and is not shown on the figure at all. Also, there is no mention of antimony in the text on page 7 for AOC J. Page 10 states that antimony is not associated with a CERCLA release and therefore not evaluated. In this case, antimony exceeded the maximum background and should be discussed further.

11. Figure 12: Benzo(a)pyrene should be shown on Figure 13 with the subsurface soil exceedances.

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)
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NABLC correspondence file