

Comments from Peter Knight and John McCloskey regarding the August 1999 draft Technical Memorandum - Ecological Risk Assessment for SWMUs 1, 2B, 11, 15, 16, 21, 22, 25, and 26 at the Naval Air Station Oceana, Virginia Beach, Yorktown, Virginia

ATTENDEES: Tim Reisch
Chris Wallace
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DATE: October 7, 1999

Agenda:

1. Wrap up any outstanding issues with the No Further Action (NFA) sites.
2. Discuss comments made by Peter and John regarding the Technical Memo (TM) for SWMUs 1, 2B, 11, 15, 16, 21, 22, 25, and 26.

Agenda Topic 1:

Two TMs regarding Removal Action Confirmation Sampling Information and Groundwater Travel Times will be attached to the Screening ERA for the NFA sites. These TMs and the Meeting Minutes from prior conference calls regarding the Screening ERA will be sent to Bob Stroud of the EPA and Steve Mihalko of the VDEQ. All comments, TM's, and the Screening ERA will be discussed in the November Tier 1 meeting, after which, a final Screening ERA for the NFA sites will be prepared.

Agenda Topic 2:

These meeting minutes will serve as a Consensus Document. These minutes will be emailed to all attendees of the meeting by October 12th and any comments will be due back to Jack Robinson by October 22nd. The finalized minutes will be used to finalize the Technical Memo and both will be presented at the Tier 1 meeting in November.

The comments from Peter Knight and John McCloskey were divided into five categories: 1) Data Issues; 2) editorial comments; 3) information requested is provided later in the TM; 4) information to be further elaborated upon in the Screening ERA; and 5) other.

The comments are presented below in the order in which they were discussed during the conference call.

Category 2 – Editorial:

Comment #2 – The incomplete sentence in Section 2.2.2 of the TM will be completed to say “As part of this construction, the uppermost reach of the drainage ditch will be redirected and a sedimentation pond will be constructed.”

Comment #3 – The subgroup agreed that the soil types and/or descriptions would be added to each SWMU description.

Comment #9 – The subgroup agreed that TPV will be defined as Total Petroleum Volatiles (TPV) and a description of this parameter will be provided.

Comment #11 – The environmental setting of SWMU 21 (Transformer Storage Yard) will be described in better detail to clarify the current setting. The reference to stressed vegetation that was recorded in an earlier study will be removed because it does not reflect the current condition.

Comment #12 – The subgroup agreed that the detection limits for the PCBs will be documented in the TM and the Screening ERA and that if the detection limits are higher than the screening criteria, it will be discussed in the uncertainty section of the ERA. The number of soil samples taken at SWMU 21 and where they were taken will be documented. The TM will specify that soil samples rather than gravel samples were taken.

Comment #13 – The subgroup agreed that the first sentence in the first bulleted text of Section 4.1.2 will say “Individual SWMUs will be evaluated in one screening ERA document.” The remainder of this bullet will stay the same.

Comment #14 – The second bullet of text in Section 4.1.2 will say “The Screening ERA will consider on-site, perimeter, and down-gradient data.

Comment #16 – The subgroup agreed that the Screening ERA will not screen sub-surface soil. Therefore, in Section 4.1.3.2, the second bullet under SWMU 1 will be deleted, the first bullet under SWMU 2B will be deleted, and the first bullet under SWMU 26 will be deleted. In addition, the second sentence in the fourth bullet of section 4.1.3.1 will be deleted.

Comment #18 – In Section 4.1.3.1 in the second bullet, the sentence “For groundwater and surface water, samples from the most recent one-year period will be considered to account for potential seasonal effects.” will be changed to “For groundwater and surface water, samples from the most recent one-year period will be used. These data will also be used to evaluate potential seasonal effects.” (Also see comment #17)

Comment #21 – In order to clarify that there are no aquatic habitats at SWMU 21, information concerning the following will be added to the TM:

- TSCA regulations which require daily inspection for PCB transformers in storage will be cited. Documentation of the cleanup sequence of the transformer oil spill at this site will be provided to show cleanup occurred soon after the spill occurred.
- Data from the three RFI Phase III sampling locations and ten RFI Phase I sampling locations will be summarized to show there is sufficient data to conduct the ecological screen.

- Document where the stormwater manhole outside the fence drains, and document the distance from the site to the nearest surface water body to show there are no aquatic receptors at or near the site.
- Document that the swale adjacent to the site is not hydraulically connected to groundwater.

Comment #22 – The Navy clarified that what is called a ditch is really a low mowed depression (i.e.: swale.) The TM will provide information to show that this is a low, graded mowed area between two parking lots where stormwater ponds and percolates into the groundwater, but does not connect to surface waters. Also, references to the nearby wetland will be deleted because the wetland is not hydraulically connect to or impacted by the site.

Category 3 – Information requested is provided later in the TM:

Comment #1 – No changes are necessary.

Comment #4 – No changes are necessary.

Comment #5 – No changes are necessary.

Comment #7 – Section 2.2.4 describes a large palustrine open water and emergent wetland at SWMU 15. The wetland language will be clarified to show that this wetland is the man-made pond created as a result of the soil excavated for the biological treatment of petroleum contamination. It was noted that the small depressional wetland was recently sampled for sediment, as was the pond. (See Comments #8 & #10))

Comment #10 – In section 2.2.4, the sentence “The Navy removed the upper six feet of biopile soil and distributed it as clean fill.” will be changed to say “The Navy removed the upper six feet of biopile soil and staged it for use in the tarmac restoration project. The determination of clean fill from the perspective of ecological risk will be determined in the ecological risk process.”

Confirmatory sampling of the treated biopile will be used in the Screening ERA. Jack will draft a Technical Memo based upon these results and Peter and John will review the TM.

Category 1 – Data Issues:

Comment #8 – The subgroup discussed their previous meeting of 21 June 99 where additional sampling needs for SWMU 15 site were identified in order to conduct an ecological screening, including sampling locations and parameters. It was confirmed that the sampling agreed upon in the June meeting, along with confirmation sampling of soil from the biopile, comprises the data needed for the ecological screen at this site, and that sampling from 1982, 1984, and 1988 would not be used. Rational for not using this data will be provided in the ERA, including a discussion that current site conditions have changed since 1988 due to remedial activities at the site.

Comment #6 – Tim is getting some EPA aerial photographs of the SWMU 11 area to attempt to determine where the land farming occurred. If the location of the land farming area can be determined, then surface soil sampling of the area will be performed. If the aerial photos show no past land farming activities, surface soil sampling will not be necessary, and the suspect land farming area will be considered closed for ecological purposes.

Category 4 – Information will be further elaborated upon in the Screening ERA:

Comment #15 – The last bullet in section 4.1.2 will be changed to read “The data table will include reporting limit range, frequency of detection, maximum contaminant detected, sample ID of maximum concentration detected, arithmetic mean, standard deviation, screening values, frequency of exceedance, and maximum hazard quotient. This table will be formatted similar to the tables developed for the Tier II Ecological Workshop.”

Comment #17 – The first sentence of the second bullet in Section 4.1.3.1, “All surface soil and sediment data will be considered under certain circumstances: (1) COPCs are not readily degradable (e.g., metals); (2) there are no data quality problems with the older data; and (3) sampling locations of older samples are not co-located with those of later samples.” will be changed to read “All surface soil and sediment data will be considered. Decisions on data use will be documented in the ERA.” (Also see comment #18)

Comment #20 – In Section 4.1.5, a bullet will be added saying “Only conservative assumptions will be used (i.e., area use factor of one, maximum ingestion rate, minimum body weight, maximum media concentration).”

Category 5 – Other:

Comment #19 – No changes are necessary.

Tim Reisch added a comment: Under section 4.1.3.2, SWMU 15, the first two bullets will be deleted and groundwater will be added to the third bullet. Also, a note will be added to indicate that the data described in this bullet was collected at the recommendation of the eco-subgroup at their 21 June 99 meeting. A bullet will also be added to indicate that soil data from confirmation sampling of the biopile will be used for the ecological screen.

The Navy has investigated SWMU 16/16GC as one SWMU because of the site similarities; both SWMUs were relatively small disposal areas for pesticide shop rinsewater. To eliminate confusion between these two sites, it was agreed that of these each SWMUs will be discussed and evaluated separately in the ERA.

Jack will email figures containing the proposed sampling locations to John and Peter.

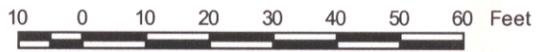
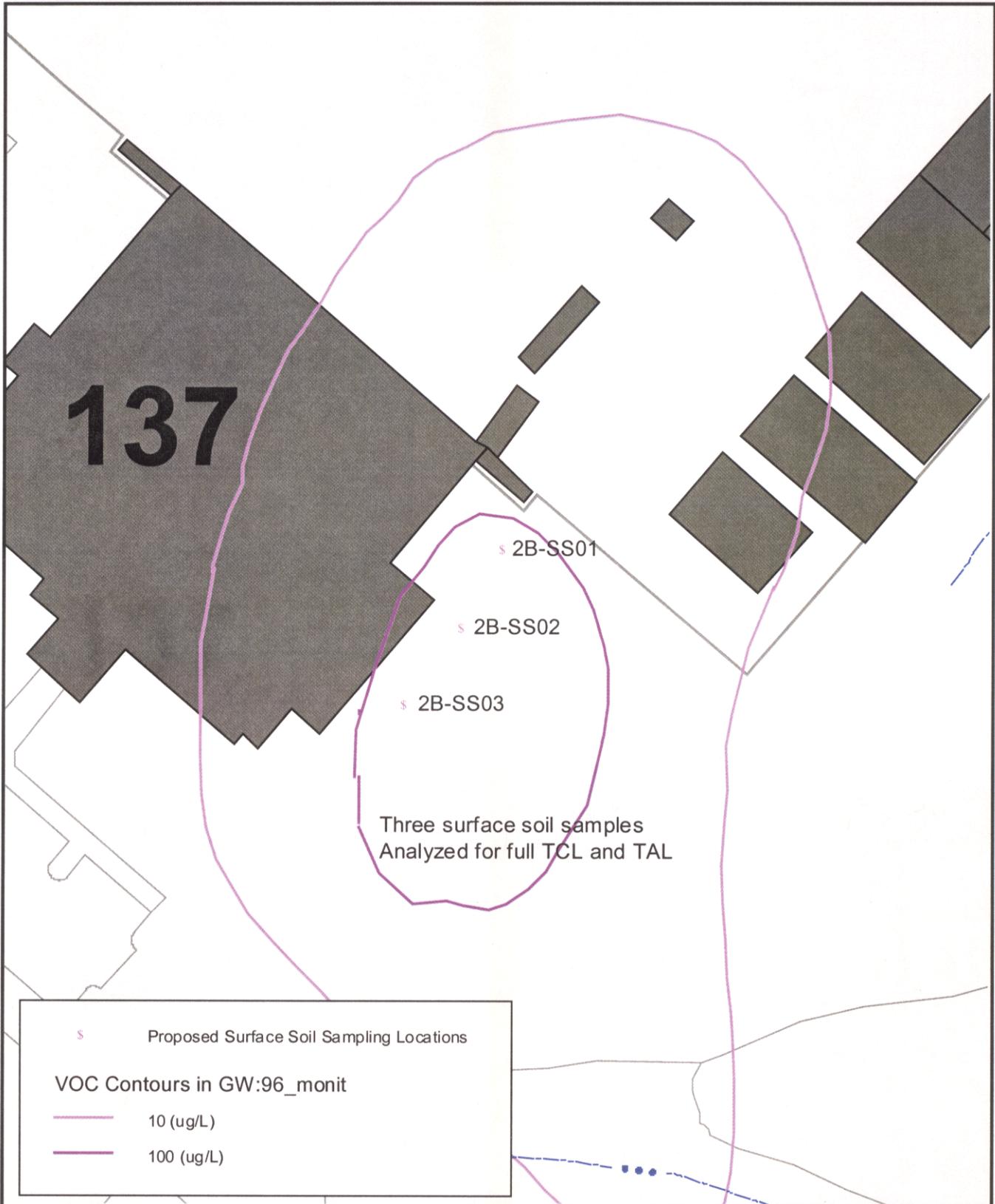


Figure 1
 PROPOSED SURFACE SOIL SAMPLING LOCATIONS
 SWMU 2B
 Naval Air Station, Oceana

00345-DB14

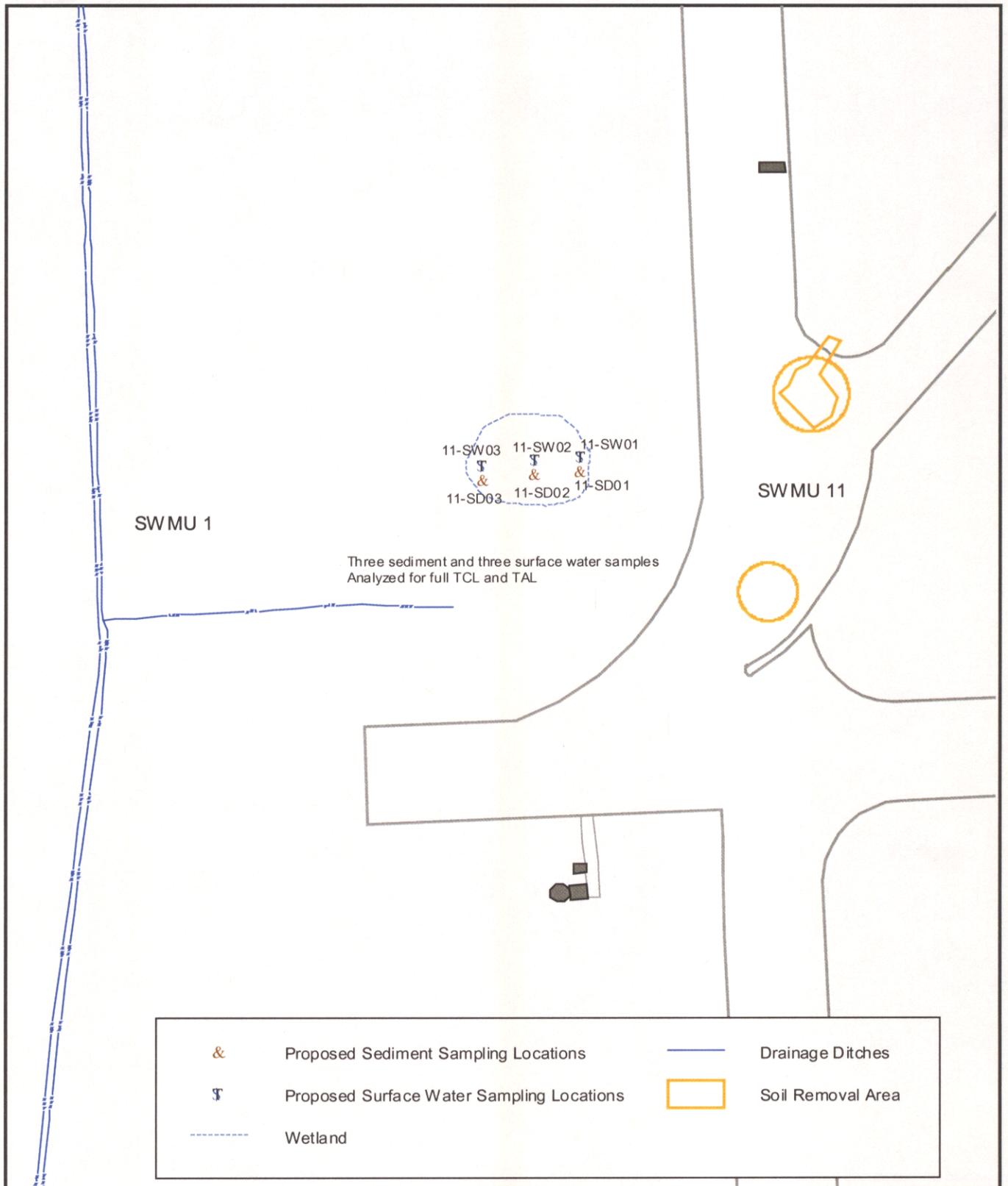


Figure 2
 PROPOSED SURFACE WATER AND
 SEDIMENT SAMPLING LOCATIONS - SWMU 11
 Naval Air Station, Oceana

10 0 10 20 30 40 50 60 Feet

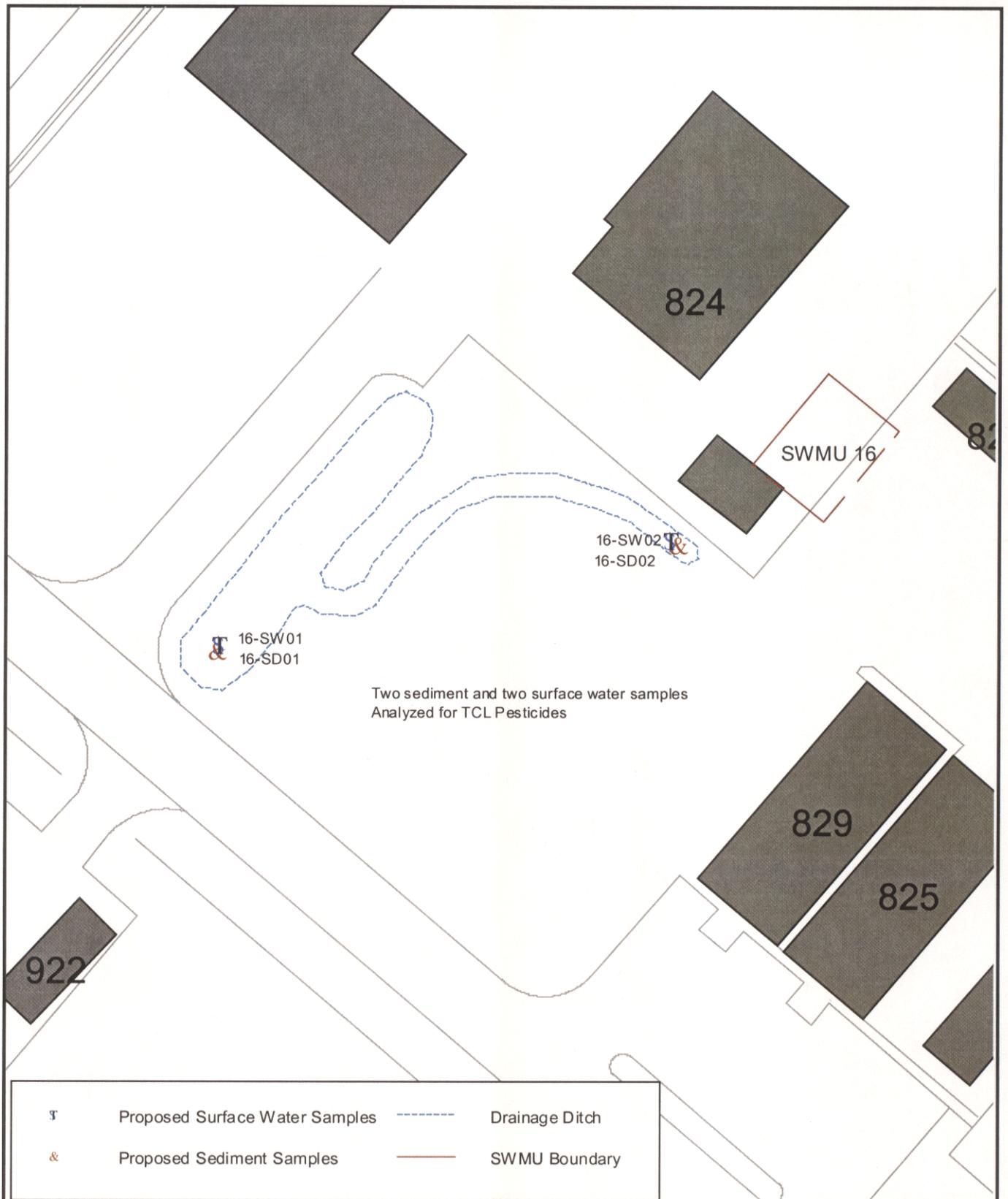


Figure 3
 PROPOSED SURFACE WATER AND
 SEDIMENT SAMPLING LOCATIONS - SWMU 16
 Naval Air Station, Oceana



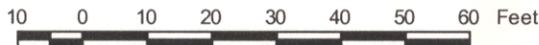
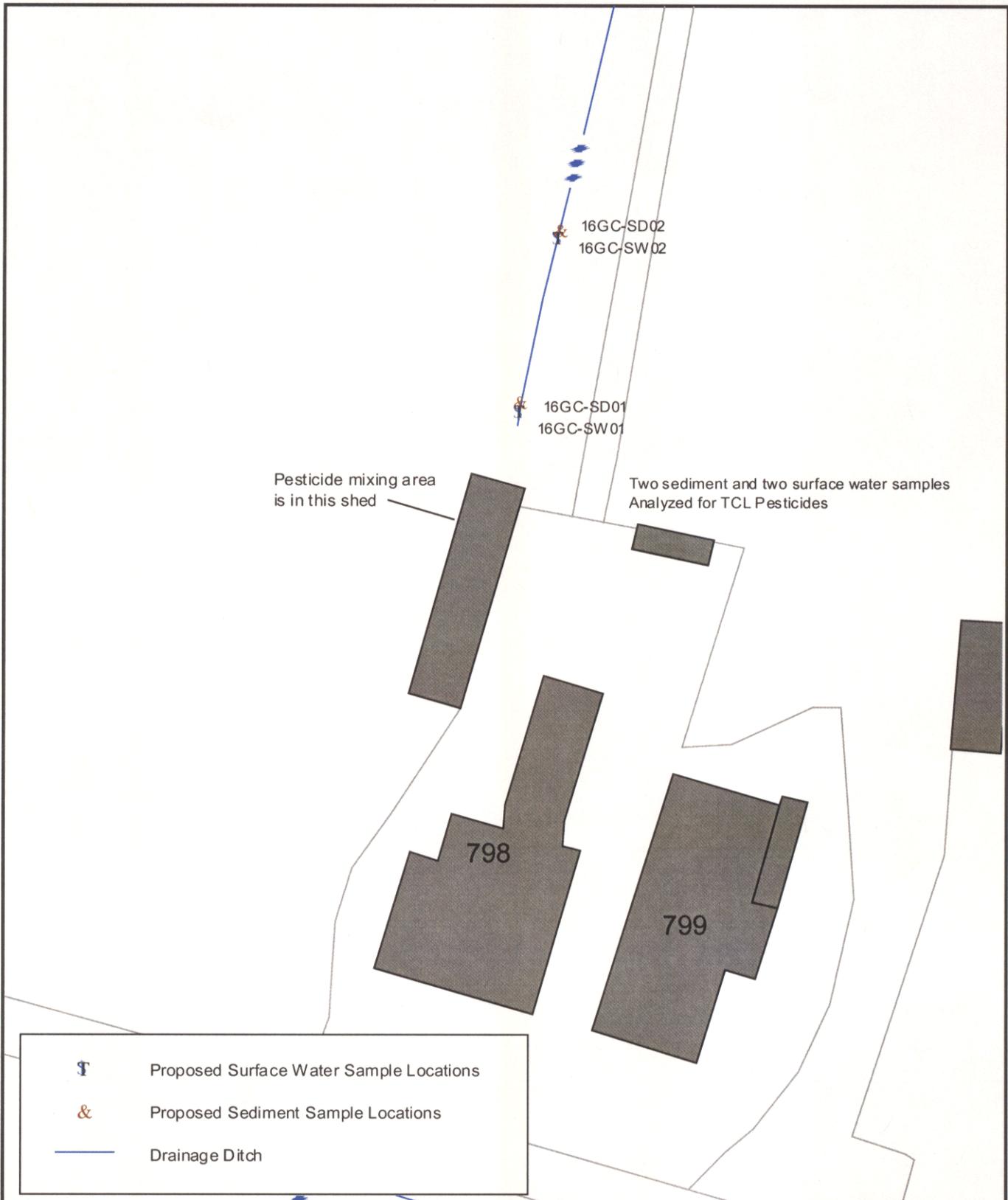
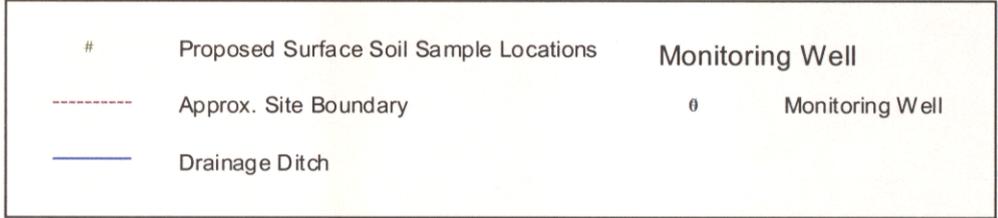
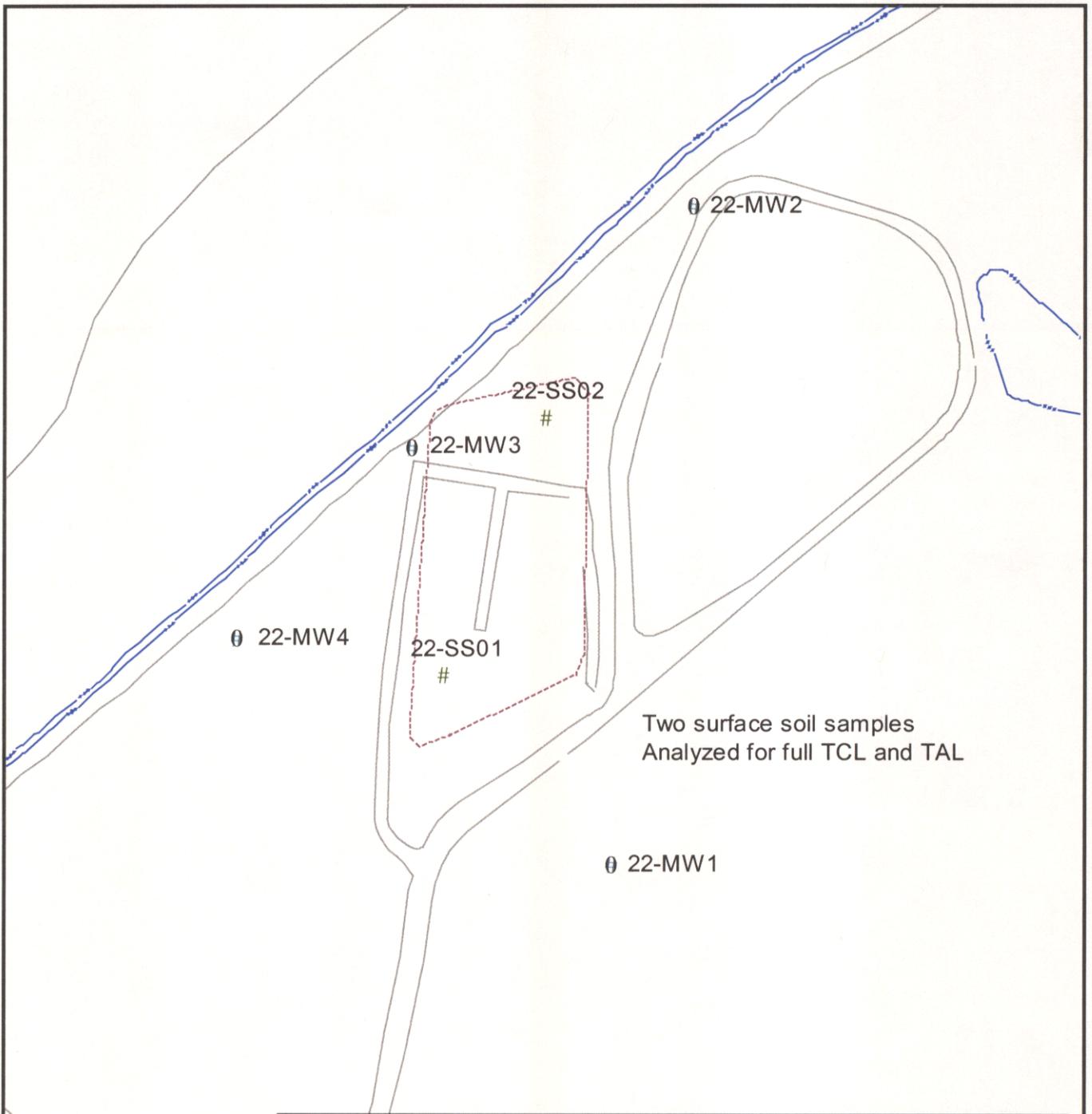


Figure 4
 PROPOSED SURFACE WATER AND
 SEDIMENT SAMPLING LOCATIONS - SWMU 16GC
 Naval Air Station, Oceana



050

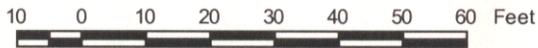


Figure 5
PROPOSED SURFACE SOIL SAMPLING LOCATIONS
SWMU 22
Naval Air Station, Oceana

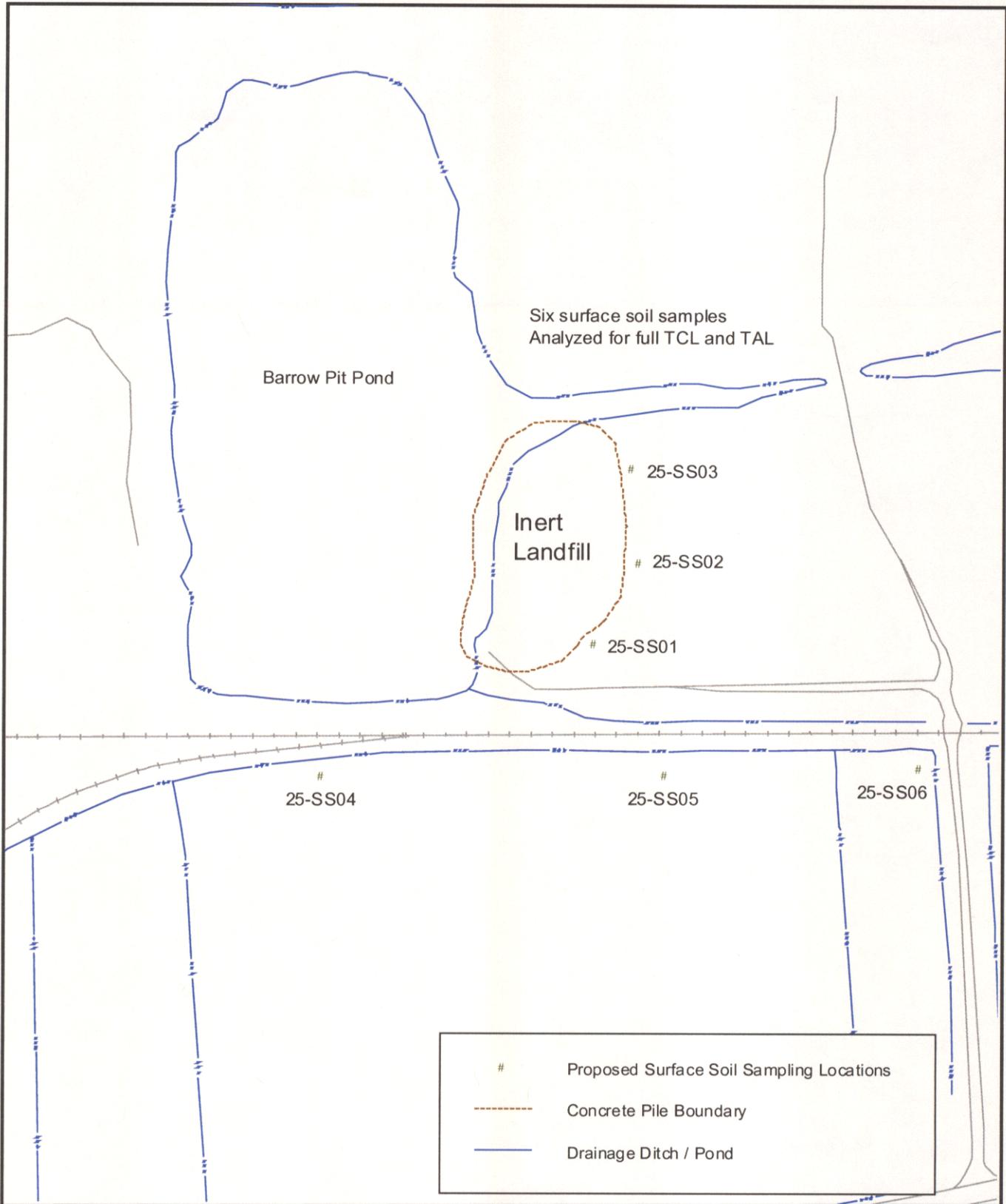
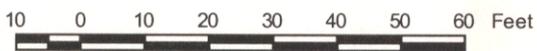


Figure 6
 PROPOSED SURFACE SOIL SAMPLING LOCATIONS
 SWMU 25
 Naval Air Station, Oceana



220

Three surface soil samples
Analyzed for full TCL and TAL

26-SS03

Former Tank Location



26-SS02

221

26-SS01

#	Proposed Surface Soil Sample Locations
	Former Tank Location

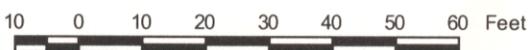


Figure 7
PROPOSED SURFACE SOIL SAMPLING LOCATIONS
SWMU 26
Naval Air Station, Oceana