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ST JULIENS CREEK  
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U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
COMMENTS REGARDING DRAFT FIVE YEAR REVIEW REPORT ST JULIENS CREEK  
ANNEX CHESAPEAKE VA (PUBLIC DOCUMENT)

03/02/2010  
CH2M HILL

**Responses to Comments  
Draft Five Year Review Report  
St. Juliens Creek Annex  
Chesapeake, VA**

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DATE: March 2, 2010

**Comments from VDEQ, provided 24 February 2010.  
RPM Comments**

1. *Comment: Please include data on the inorganic COCs previously sampled and phased out (i.e., cadmium, iron, lead, thallium) in the report.*

*Response:* A figure depicting the detections and exceedances of screening criteria from the voluntary groundwater performance monitoring conducted from 2006 to 2008 has been added as Figure 3-4. A reference to the figure has been added to the end of the third sentence of the first paragraph in Section 3.4.5. The arsenic technical memorandum (and associated data) documenting the additional arsenic data collected in 2009 was included as an appendix because it was not previously reviewed by the team, and therefore provided for comment with the Five-Year Review Report.

2. *Comment: Please include information on the success of the mitigation wetland at NNSY Site 9 in the report.*

*Response:* The following paragraph has been added at the end of Section 3.3.3: "A compensatory mitigation plan to plant wetland grasses at nearby Norfolk Naval Shipyard Site 9 to compensate for the wetland impacts at Site 4 (JV I, July 2005) was submitted and the approach was approved by the USACE. The plan did not require monitoring of the wetland compensatory mitigation. Although a formal monitoring plan was not implemented, visual observation confirmed the site is currently a vegetated wetland."

3. *Comment: Since PAHs in soil are a site COC, please include an explanation of why they were not sampled as part of the 5 year review report.*

*Response:* PAHs were not sampled for because they were ecological COCs. The monitoring plan was established based on human health COCs because there was no future exposure pathway for ecological receptors. No changes have been made to the text, which currently states: "Four monitoring wells (three

downgradient and one upgradient) were sampled for the human health COCs identified in surface soil (arsenic and iron) during the RI and the inorganics that were detected at concentrations that exceeded the Maximum Contaminant Level (MCL) or Federal action limit in groundwater (arsenic, cadmium, lead, and thallium) data collected as part of the RI (CH2M HILL, 2003).”