

N69118.AR.001399  
ST JULIENS CREEK  
5090.3a

EMAIL AND COMMENTS FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
REGARDING EXPANDED SITE INSPECTION REPORT MUNITIONS RESPONSE PROGRAM  
AREA UNEXPLODED ORDNANCE 1 (UXO 1) ST JULIENS CREEK ANNEX VA  
3/25/2013  
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

**From:** [Doran, Karen \(DEQ\)](#)  
**To:** [Jones, Adrienne/VBO](#); [Bob Stroud](#); [Staszak, Janna/VBO](#); [Krista Parra](#)  
**Subject:** Area UXO 1 ESI - VDEQ comments  
**Date:** Monday, March 25, 2013 3:16:51 PM

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Team –

Kyle Newman and I have reviewed the referenced document and submit the following VDEQ comments:

General Comments

1. Please indicate how the ecological risk PAL for 2,4,6-TNT of 0.13 was derived. It is not clarified in the SAP.
2. VDEQ does not agree that NFA is appropriate regarding MC for the site at this time. The three detections of TNT were localized at samples 8, 9, and 10 which included one exceedance of the PAL and another detection just under it. Since sampling was performed by collecting sediment from debris extracted from the river floor, it is difficult to know if these sediment data are representative of surface or subsurface conditions at the site. Given the localized detections around Wharf 1, there is significant potential for a more significant release than what has been detected. VDEQ requests additional characterization of the sediments surrounding Wharf 1 to determine if a release has occurred.

Specific Comments

3. Section 2.1 – Can more information be provided about the specific site and its setting? Only three sentences of this section refer to this site specifically while the rest is focused on SJCA as a whole. General information such as site acreage, estimated volume of ordnance that went through the wharfs in question, etc. and any gaps in knowledge about the site history should be identified.
4. Figure 2-5 – The intent of the "Location 4" label on this figure is not clear.
5. Section 4.5, first bullet – Did the partnering team approve of the location modifications? Please indicate this in the text since there were no sampling locations adjacent to the northern wharf near the "Magnetic Anomaly Concentration Areas" depicted in Figure 2-3 and there appears to be a data gap.
6. Section 4.5, page 4-3, last bullet: It is unclear as to how this bullet represents a deviation from the Work Plan or provides any relevant information to the investigation. Please remove this bullet.
7. Section 5: Please include a discussion evaluating the investigation's ability to meet the DQOs identified in the SAP.

Thank you for the opportunity to comment.

*Karen M. Doran*

Technical Reviewer  
Federal Facilities Program  
Department of Environmental Quality  
629 East Main Street  
Richmond, VA 23219  
phone - 804.698.4594  
[karen.doran@deq.virginia.gov](mailto:karen.doran@deq.virginia.gov)