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EMAIL AND VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY RESPONSE TO U S
NAVY RESPONSE TO COMMENTS ON DRAFT EXPANDED SITE INSPECTION REPORT
MUNITIONS RESPONSE PROGRAM AREA UNEXPLODED ORDNANCE 1 (UXO 1) ST
JULIENS CREEK ANNEX VA
5/6/2013
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

From: [Doran, Karen \(DEQ\)](#)
To: [Staszak, Janna/VBO](#); krista.parra@navy.mil; Stroud.Robert@epa.gov
Cc: [Jones, Adrienne/VBO](#)
Subject: Area UXO 1 ESI - VDEQ response to RTCs
Date: Monday, May 06, 2013 2:39:15 PM

Team –

Kyle and I have reviewed the RTCs and redlined document and submit the following responses to the RTCs:

1. Comment not resolved. The sediment screening benchmark in the report cited is actually 0.406 mg/kg as shown in Table 3-5 of the referenced report. This screening value also used site specific TOC data from the sediments in its derivation. There is some question as to whether the assumptions used in those calculations are appropriate to UXO 1. Are TOC data available for UXO 1? VDEQ suggests that the team's toxicologists discuss this approach and its appropriateness before it is adapted for UXO 1. VDEQ will also need a copy of the final report cited in the RTC, since draft site-specific documents that have not received final regulatory approval will be difficult to accept as established precedent.
2. Comment not resolved. See response to RTC #1.
3. Comment resolved.
4. Comment resolved.
5. Comment resolved. However, it is troubling that there appear to be no sampling locations adjacent to the former northern wharf location where the DMM may actually have dropped. This concern is somewhat mitigated by the absence of DMM at locations adjacent to the southern wharf.
6. Comment resolved.
7. Comment not resolved. The approach used during the UXO 1 ESI is quite novel and has not yet been widely accepted by the regulatory community or even DoD. While the project team did develop and approve the work plan and SAP, the team has a responsibility to look at the work that was done and evaluate if the actions taken achieved the project goals. There have been many investigations, particularly MMRP investigations, where an approved plan has been written, approved, and executed as planned but DQOs were still not achieved based on a wide variety of factors. It should also be noted that the investigation was not conducted exactly as described in the work plan and SAP, as documented in Comment #5 and its response. Please include a section which evaluates the work performed and if the project DQOs were achieved.

Let me know if you have any questions.

Thanks,

Karen M. Doran

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