

Staszak, Janna/VBO

From: Doran, Karen (DEQ) [Karen.Doran@deq.virginia.gov]
Sent: Tuesday, February 16, 2010 3:16 PM
To: Staszak, Janna/VBO; walt.j.bell@navy.mil; Stroud.Robert@epa.gov
Cc: Jones, Adrienne/VBO
Subject: RE: SJCA Site 2 Draft PP - RTC for VDEQ Comments

Janna -

All RTCs are acceptable except for the response to Comment #4:

4. **Comment:** *Table 1, Site 2 Remedial Investigation summary, third sentence ("No risk from exposure to groundwater was identified"): How is this possible?*

Response: The statement is correct; no unacceptable groundwater risks or hazards were identified during the Remedial Investigation (RI). No changes are proposed for the table for the public audience. However, the following more-detailed explanation is offered for VDEQ: The RI Human Health Risk Assessment (HHRA) evaluated the following exposure routes for groundwater:

- Current resident (adult): ingestion of and dermal contact with deep aquifer groundwater, and inhalation of volatiles from deep aquifer groundwater while showering
- Current resident (child): ingestion of and dermal contact with deep aquifer groundwater while bathing

- Future resident (adult): ingestion of and dermal contact with deep aquifer groundwater, and inhalation of volatiles from deep groundwater while showering.
- Future resident (child): ingestion of deep aquifer groundwater, and dermal contact with deep aquifer groundwater while bathing
- Future construction worker: dermal contact with shallow groundwater during excavation activities.

Potable use of shallow groundwater was not evaluated during the RI HHRA based on the fact that its current or future use was not reasonably anticipated. The evaluation of shallow groundwater for potable use was added during the Expanded RI HHRA.

Additionally, the monitoring wells where the highest concentrations of contaminants of concern have been detected were not installed until the Expanded RI. RI groundwater monitoring wells comprised SJS02-MW01S, -MW02S, -MW03S, -MW04S, -MW05S, -MW01D, -MW02D, and -MW05D.

Some of this information needs to be included in Table 1 in the PP because it is misleading as it is currently written. For instance, include that shallow groundwater was not included in the risk assessment but was included in the ERI risk assessment, that the high concentrations at the site were not identified until the ERI because of monitoring well locations, etc.

Thanks,
Karen

From: Janna.Staszak@CH2M.com [mailto:Janna.Staszak@CH2M.com]
Sent: Thursday, February 11, 2010 9:32 AM
To: Doran, Karen (DEQ); walt.j.bell@navy.mil; Stroud.Robert@epa.gov
Cc: Adrienne.Jones@CH2M.com
Subject: SJCA Site 2 Draft PP - RTC for VDEQ Comments

Karen and Team,

The responses to the VDEQ comments on the Draft Site 2 Proposed Plan are attached. Let me know if the responses are acceptable or if you have additional concerns.

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