

Responses to Comments
Draft Proposed Plan
Site 2: Waste Disposal Area B
St. Juliens Creek Annex
Chesapeake, Virginia

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DATE: February 11, 2010

Comments from VDEQ, provided 5 February 2010

1. **Comment:** *Section 1, second paragraph, first sentence: Insert "regulatory" between support and agency following VDEQ.*

Response: The suggested change has been made.

2. **Comment:** *Section 2.2, first paragraph, last sentence: Capitalize "Affairs" in Public Affairs Office.*

Response: The suggested change has been made.

3. **Comment:** *Table 1, RFA summary, last sentence: What are the details on the three SWMUs and one AOC in Site 2?*

Response: The last sentence has been revised to read as follows: The RFA recommended further action for three SWMUs and one AOC identified within the current Site 2 boundary: SWMU 2 (Dump B), SWMU 3 (Dump B Incinerator), SWMU 4 (Dump B Blast Grit), and AOC A (Satellite Storage at Building 279).

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.

5. *Comment: Table 1, Expanded Remedial Investigation reference date: Should 2001 be 2007?*

Response: The reference data has been corrected to 2008.

6. *Comment: Table 1, Expanded Remedial Investigation summary: Should shallow groundwater be mentioned in this paragraph?*

Response: "shallow and deep" has been inserted in front of groundwater in the first sentence of the paragraph to clarify that both shallow and deep groundwater samples were collected and evaluated.

7. *Comment: Table 1, Feasibility Study, date. Should 2002 be 2009?*

Response: The date has been corrected to 2008 to 2009.

8. *Comment: Section 3, first paragraph, second sentence. Delete "Most of" from the beginning of the sentence.*

Response: The suggested change has been made.

9. *Comment: Figure 5. Same figure title as Figure 3. Please distinguish.*

Response: The title of Figure 5 has been changed to "Site 2 Impacted Areas".

10. *Comment: Section 3.3 title: Should this say "Principal Threat Wastes"?*

Response: The section title has been revised to "Principal Threat Waste".

11. *Comment: Section 5.1, first paragraph, fifth sentence: Include a statement indicating how low the concentrations were during the latest sampling event (include data).*

Response: A reference to Section 3.1 has been added to the sentence. Section 3.1 indicates that VOCs were detected below the drinking water standards or not detected during the most recent sampling events.

12. **Comment:** Section 5.2, Aquatic Receptors, second paragraph, last sentence: Change “was” to “were”.

Response: The suggested revision has been made.

13. **Comment:** “What is Ecological Risk and How is it Calculated?” box: Delete the “-” from “concept-tually”.

Response: The suggested revision has been made.

14. **Comment:** Table 8 title, correct the spelling of “Comparati<v>e”.

Response: The suggested revision has been made.

15. **Comment:** Section 9, first paragraph, first sentence: Delete the “s” from “high-concentration target areas”.

Response: The suggested revision has been made.

16. **Comment:** Page 16, contact information, Mr. Robert Stroud: Insert spaces after the area codes.

Response: The suggested revision has been made.

17. **Comment:** Page 16, contact information, Ms. Karen Doran: Spell out Department and wrap if necessary, delete the fax number, and update the email address to “karen.doran@deq.virginia.gov”.

Response: The suggested revisions have been made.

18. **Comment:** Section 10, first paragraph, second sentence: Delete the “,” after March, 20 2010”.

Response: The suggested revision has been made and the dates have been revised to reflect the current schedule.

19. **Comment:** Section 10, first paragraph, second sentence: Correct the public meeting year.

Response: The public meeting year has been corrected and the public review period and meeting dates have been updated based on the current schedule.