

3/18/03 - 00186

**CH2MHILL** TRANSMITTAL

**To:** LANTNAVFACENCOM  
Code EV22-DMH  
1510 Gilbert Street, Bldg. N26  
Norfolk, VA 23511-2699

**From:** CH2M HILL  
William J. Friedmann, Jr.

**Attn:** Ms. Dawn Hayes, P.E.

**Date:** March 18, 2003

**Re:** Responses to Comments – Draft Final RI for Sites 3, 4, 5, and 6

**We Are Sending You:**

<b>X Attached</b>	Under separate cover via	
Shop Drawings	Documents	Tracings
Prints	Specifications	Catalogs
Copy of letter	Other:	

Quantity	Description
1	Responses to Comments – Draft Final RI for Sites 3, 4, 5, and 6

Remarks:

Enclosed is a copy of the Responses to Comments – Draft Final RI for Sites 3, 4, 5, and 6 letter. This letter should have been enclosed with the Final Remedial Investigation/Human Health Risk Assessment/Ecological Risk Assessment Report for Sites 3, 4, 5, and 6 for St. Juliens Creek Annex, Chesapeake, Virginia.

If you have any questions, please do not hesitate to contact me at (757) 460-3734, extension 19.

Sincerely,  
CH2M HILL



William J. Friedmann, Jr.  
Activity Manager

Copy To:

Mr. Todd Richardson/USEPA Region III  
Ms. Debbie Miller/VDEQ  
Ms. Valerie Walker/CNRMA  
Ms. Donna Caldwell/CH2M HILL-HRO



**CH2MHILL**

CH2M HILL  
5700 Thurston Avenue  
Suite 120  
Virginia Beach, VA 23455  
Tel 757.460.0429  
Fax 757.460.4592

March 18, 2003

138802.RI.FR  
03-WJF-137

Ms. Debbie Miller  
Virginia Department of Environmental Quality  
629 East Main Street  
Richmond, Virginia 23219

Subject: Responses to Comments - Draft Final RI for Sites 3, 4, 5, and 6  
St. Juliens Creek Annex, Chesapeake, Virginia  
N62470-95-D-6007, CTO 0027

Dear Ms. Miller:

CH2M HILL has prepared the following responses to VDEQ comments submitted August 21, 2002 on the Draft Final RI for Sites 3, 4, 5, and 6, St. Juliens Creek Annex, Chesapeake, Virginia by Ms. Jennifer Jones of VDEQ. Responses to comments are addressed herein.

1. Comment: Section **7.3.2.4** and Table 7-7. Please explain why accidental ingestion of the surface water was not considered for recreational users? The text indicates that the areas of surface water are too shallow for swimming but may possibly be used for wading. If the sediment can be ingested, then the water can be ingested. If ingestion was deemed insignificant compared to dermal exposures, then ingestion of sediment and surface water may be omitted. However, the text should explain why exposure pathways/routes were or were not included in the HHRA. (Carryover comment from draft version)

Response: Incidental ingestion of surface water was not evaluated in the risk assessment since the receptors would be wading in the surface water and not swimming in the surface water. While incidental ingestion of surface water would occur during swimming since the head is in the water, incidental ingestion of surface water is expected to be insignificant during wading. Incidental ingestion of sediment while wading was assumed to be a potential pathway since the sediment from the shallow surface water body and the banks of the surface water body may stick to the hands and may be transferred to the mouth at a later time. This explanation will be added to the text.

Ms. Debbie Miller  
Page 2  
March 18,2003

2. Comment: Section 7.5.3.1, page 7-37, Current Resident Child paragraph, last line. "CT future child resident " should read "CT current child resident."

Response: CT future child resident will be changed to CT current child resident.

RAGS D Tables:

3. Comment: Table 1s, Selection of Exposure Pathways for each site should **also** include pathways that were not considered and rationale for their exclusion. See RAGS D instructions for Table 1. The first comment regarding surface water ingestion should be addressed in this table.

Response: Table 1s will be updated to include surface water ingestion.

4. **In Tables 2s for Site 5/6, mg/kg is used as units for everything and the tables appear to use calculated RBCs that do not correspond to standard RBCs for screening toxicity values. Be consistent with units. Sites 3 and 4 use ug/kg for organics and mg/kg for inorganics.**

Response: All soil and sediment tables will be changed to use mg/kg **as** units for all constituents.

5. Comment: Tables 2.3 and 2.4, Groundwater for Sites 3 and 4. Chloroform screening value is listed as 0.063 ug/l. It should be 0.15 ug/l according to the RBC chart. The change does not affect the outcome.

Response: The chloroform screening value is correct. The RBC for chloroform on the Region III RBC table is 0.15!. The ! indicates that the RBC calculated for noncancer effects divided by 10 is less than the cancer RBC. Therefore, the RBC for noncancer effects divided by 10, **which** is 0.063 ug/l is used as the screening value for chloroform.

6. Comment: Table 2.10, surface water for Site 3. Cobalt screening value is listed as 1,500 ug/l. It should be 730 ug/l, which was correctly listed in the Site 4 tables. This does not affect the outcome.

Response: Cobalt screening value will be changed to 730 ug/l.

Ms. Debbie Miller  
Page 3  
March 18,2003

If you have any questions concerning these comments, please do not hesitate to contact me at (757) 460-3734, extension 19.

Sincerely,  
CH2M HILL

A handwritten signature in black ink that reads "William J. Friedmann, Jr." in a cursive script.

William J. Friedmann, Jr., P.G.  
Activity Manager

cc: Ms. Dawn Hayes/ LANTDIV  
Ms. Jennifer Jones/VDEQ  
**Mr.** Todd Richardson/USEPA  
Ms. Valerie Walker/CNRMA  
Ms. Donna Caldwell/CH2M HILL-HRO  
Ms. Kim Henderson/CH2M HILL-VBO  
Ms. Beth Collier/LANTNAVFACENGCOM