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LETTER AND ATTACHED VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY COMMENTS ON THE REMEDIAL INVESTIGATION SAMPLING AND ANALYSIS PLAN YOUTH POND WILLIAMSBURG FISC VA
7/17/2012
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

From: Smith, Wade (DEQ) [Wade.Smith@deq.virginia.gov]
Sent: Tuesday, July 17, 2012 10:14 AM
To: scott.park@navy.mil
Cc: Ivester, Marlene/VBO; Sawyer, Stephanie/VBO; Haug.Susanne@epamail.epa.gov; Newman, Kyle (DEQ)
Subject: CAX: Youth Pond SAP - DEQ Comments
Attachments: Draft UFP-SAP_CAX Youth Pond_for_team(DEQ).docx

Follow Up Flag: Follow up
Flag Status: Completed

Thank you for giving the DEQ the opportunity to comment on the June 2012 Remedial Investigation Sampling and Analysis Plan for the Youth Pond site at CAX.

The SAP was received by the DEQ on June 8, 2012.

The DEQ's comments are attached (track changes via Word).

Please let me know if you have any questions.

Thanks,
wade

Wade M. Smith
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Virginia Department of Environmental Quality
Office of Remediation Programs
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SAP Worksheet #3—Distribution List

Name of SAP Recipients	Title/Role	Organization	Telephone Number	E-mail Address or Mailing Address	D	DF	F
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John Burchette	RPM	USEPA Region 3	(215) 814-3378	Burchette.John@epamail.epa.gov	A	CL	A
Wade Smith	RPM	VDEQ	(804) 698-4125	Wade.Smith@deq.virginia.gov	A	CL	A
Bonnie Capito	Librarian	NAVFAC Atlantic	(757) 322-4785	Bonnie.Capito@navy.mil			A
Marlene Ivester	Activity Manager (AM) for CAX	CH2M HILL	(757) 873-1442, x41634	Marlene.Ivester@ch2m.com			A
Stephanie Sawyer	Deputy AM for CAX and Project Manager (PM)		(757) 671-6273	Stephanie.Sawyer@ch2m.com	A	A	A
Toby Stewart	Field Team Leader (FTL)		(757) 419-0430	Toby.Stewart@ch2m.com			A
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Notes:

A = All, CD = Compact Disc, CL = Cover Letter, D = Draft, DF = Draft Final, HC = Hard Copy, F = Final;

Document Control Number: An administrative record number will be assigned when the final document is being prepared.

Comment [WS1]: Replace with Susanne Haug, EPA RPM, throughout document as appropriate

SAP Worksheet #9a—Project Scoping Session Participants Sheet

Project Name: Youth Pond RI **Projected Date(s) of Sampling:** September 2012 **PM:** Stephanie Sawyer	**Site Name:** Youth Pond **Site Location:** CAX, Williamsburg, VA

Date of Session: December 21, 2011 (via conference call)

Scoping Session Purpose: Team discussion and agreement on the sample locations, analytic parameters, and objectives for the Youth Pond RI.

Name	Title	Affiliation	Phone #	E-mail Address
Krista Parra	RPM	Navy	(757) 341-0395	Krista.Parra@navy.mil
Marlene Ivester	AM	CH2M HILL	(757) 873-1442, x41634	Marlene.Ivester@ch2m.com
Wade Smith	RPM	VDEQ	(804) 698-4125	Wade.smith@deq.virginia.gov
Stephanie Sawyer	Deputy AM	CH2M HILL	(757) 671-6273	Stephanie.Sawyer@ch2m.com
Ngozi Ibe	Site Manager	CH2M HILL	(703) 376-5017	Ngozi.Ibe@ch2m.com
John Burchette	RPM	USEPA Region 3	(215) 814-3378	Burchette.John@epamail.epa.gov

Comments/Decisions

Comment [WS2]: It would be nice to have additional scoping session details to include: Comments/Decisions, Action Items, and Consensus Decisions, as in the Draft SAP for Penniman Lake.

The Team held a Partnering conference call and discussed the path forward for the Youth Pond Remedial Investigation (RI). The Team agreed on the objectives of the RI, sample media, number and locations of samples, analytical parameters, and environmental questions that needed to be answered by the RI.

It was agreed that 6 surface soil samples (0-6 inches) and 14 surface sediment samples (0-4 inches) would be collected from select locations and analyzed for volatile organic compounds (VOCs), SVOCs, PCBs, pesticides, metals plus cyanide, and explosives. Subsurface sediment (4-8 inches) and surface water samples would also be collected at 5 of the 14 surface sediment sample locations and analyzed for VOCs, SVOCs, PCBs, pesticides, metals plus cyanide, and explosives.

The team also agreed that 3 fish tissue samples would be collected and analyzed for PCBs and metals. There was some discussion regarding analyzing fish tissue samples for PCB congeners as well; however, the team decided to look into this further before making a final decision.

If results of the agreed upon sampling were sufficient to adequately characterize the nature and extent of contamination, then an RI report would be prepared. If results warranted further action, then a SAP addendum proposing additional work would be submitted under a separate cover.

Wrap-Up/Action Item

1. Krista will look into what storm event data are available and will report back to the Team. *Krista informed the team on 12/29/11 that regulated outfalls (002, 017, and 033, none of which discharge to or from Youth Pond) are sampled monthly and visually inspected quarterly*.
2. Wade will check with his risk assessor to verify if PCB congener analysis is preferred and make sure it doesn't conflict with EPA requirements. *The team held a conference call to discuss the PCB congener analysis as described in* ***Worksheet #9b***.

SAP Worksheet #9b—Project Scoping Session Participants Sheet

Project Name: Youth Pond RI **Projected Date(s) of Sampling**: September 2012 **PM:** Stephanie Sawyer	**Site Name:** Youth Pond **Site Location:** CAX, Williamsburg, VA

Date of Session: February 1, 2012 (via conference call)

Scoping Session Purpose: Discuss and agree on path forward for PCB Congener Analysis

Name	Title	Affiliation	Phone #	E-mail Address
John Burchette	RPM	USEPA Region 3	(215) 814-3378	burchette.john@epa.gov
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Krista Parra	RPM	NAVFAC Mid-Atlantic	(757)-341-0395	krista.parra@navy.mil
Marlene Ivester	AM	CH2M HILL	(757) 671-1634	marlene.ivester@ch2m.com
Stephanie Sawyer	Deputy AM/PM	CH2M HILL	(757) 671-6273	stephanie.sawyer@ch2m.com
Jennifer Corrack	Human Health Risk Assessor (RA)	Navy Marine Corps Health Center	(757) 953-0950	Jennifer.Corack@med.navy.mil
Jennifer Wright	Ecological RA	NAVFAC Atlantic	(757) 322-8428	jennifer.h.wright@navy.mil
Dave Barclift	Ecological RA	NAVFAC Atlantic	(215) 897-4913	david.barclift@navy.mil
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Dawn ~~Loven~~Ioven	Toxicologist	USEPA Region 3	(215) 814-3320	ioven.dawn@epa.gov
Kyle Newman	RA	VDEQ	(804) 698-4452	kyle.newman@deq.virginia.gov
William Kappleman	Ecological RA	CH2M HILL	(703) 376-5152	William.kappleman@ch2m.com
Roni Warren	Human Health RA	CH2M HILL	(814) 364-2454	Roni.warren@ch2m.com
Anita Dodson	Chemist	CH2M HILL	(757) 671-6218	Anita.dodson@ch2m.com

Comments/Decisions

Comment [WS3]: See previous comment

The team held a conference call to discuss whether PCB congener analysis should be added to the fish tissue samples being collected at Youth Pond (and additional sites at CAX). John Burchette asked the EPA ecological and human health risk assessors whether they would be comfortable making decisions on PCBs using only Aroclor data, especially for human health assessment. Dawn ~~Loven~~Ioven replied that dioxin-like congener data would be good to have to conduct risk; however, the tests are expensive. She recommended analyzing a percentage of samples for dioxin-like congeners.

The team discussed the sampling parameters further and agreed that sediment samples would be analyzed for Aroclors only. Human health risk animal tissue samples would be analyzed for the 12 dioxin-like congeners and Aroclors, and ecological risk tissue samples would be analyzed for the 12 dioxin-like congeners and homologues (unless the cost to do this was greater than or equal to full congener analysis, in which case analysis for the full 209 congeners would be performed). This would apply to all tissue samples, not a select percentage of samples as previously recommended by Dawn ~~Loven~~Ioven. In addition, if necessary, the team agreed that tissue samples could be frozen for potential later analysis for up to one year.