

8/11/06-01915

**Capito, Bonnie P CIV NAVFAC Lant**

---

**From:** Cole, Linda L CIV NAVFAC MidAtlantic  
**Sent:** Tuesday, August 15, 2006 9:59 AM  
**To:** Capito, Bonnie P CIV NAVFAC Lant  
**Subject:** ARF - VDEQ Comments RE CAX Site 11 RI  
**Attachments:** CAX Site 11 Revised Draft RI Whole Document Text FEB06.pdf; Summary of Comments - CAX site 11 RI.pdf

---

**From:** Miller, Debra [mailto:damiller@deq.virginia.gov]  
**Sent:** Friday, August 11, 2006 10:41  
**To:** Cole, Linda L CIV NAVFAC MidAtlantic  
**Cc:** Don Joiner; Marlene Ivester; Greyson Franklin (Franklin. Greyson (E-mail))  
**Subject:** CAX Site 11 RI

Hi, Linda.

The VADEQ has completed its review of the *Remedial Investigation, Site 11-Boneyard*, for CAX. A summary of the review comments is attached. I have also attached the full RI text (in adobe form) with the comments incorporated. I hope that the files make it through everyone's various email firewall systems. If you do not get it, let me know. Additionally, please let me know if there are any questions or concerns.

<<CAX Site 11 Revised Draft RI Whole Document Text FEB06.pdf>>

<<Summary of Comments - CAX site 11 RI.pdf>>

Thanks!!

=====  
Debra A. Miller  
Remedial Project Manager  
Federal Facilities Restoration Program  
Virginia Department of Environmental Quality  
Email: [Debra.Miller@deq.virginia.gov](mailto:Debra.Miller@deq.virginia.gov)  
Phone: 804-698-4206  
Fax: 804-698-4234

*DEQ Website: [www.deq.virginia.gov](http://www.deq.virginia.gov)*

**'Mommy, I tried to be good, it is just too hard!' - Sarah Miller, Age 4**

# Summary of Comments on 8

---

Page: 16

---

Author: damiller

Subject: Note

Date: 8/11/2006 10:25:53 AM

 Page ES-2: Previous Investigations and Actions.

It is noted that not all data was utilized in this RI due to the removal action. However, please clarify whether that statement is true for all media or only for sediments and soils. For groundwater, all data should be used as no action has been taken on the groundwater.

---

Author: damiller

Subject: Note

Date: 8/7/2006 2:28:01 PM

Page 5-2: Section 5.1.

Please note, the data qualifier definitions are in Appendix E, not D. Appendix D is the chain of custody records. Please correct.

---

## Page: 48

---

Author: damiller  
Subject: Highlight  
Date: 8/11/2006 10:26:30 AM  
T Page 5-3: Section 5.4.

There are also enforceable State MCLs that should be noted.

---

Author: damiller  
Subject: Note  
Date: 8/7/2006 2:29:35 PM  
 Page 5-3; Section 5.4.

It is noted that the COPC selection was completed sometime ago. However, as the site is not yet ROD'd, a cursory review of the recent RBCs should be performed to insure the COPCs as selected are still accurate.

---

Author: damiller

Subject: Note

Date: 8/7/2006 2:33:19 PM

 Page 5-4: Section 5.4.

The State's surface water quality standards are also appropriate screening criteria. Additionally, were any ecological screening criteria utilized, and if so, those criteria should be detailed in this section as well.

---

Author: damiller

Subject: Note

Date: 8/11/2006 10:27:16 AM

 Page 5-5: Section 5.5.3.

Please note, neither Table 5-5 or Figure 5-3 provide the actual screening value. Please clarify.

---

Author: damiller

Subject: Note

Date: 8/7/2006 2:04:37 PM

 Section 7.0: The VADEQ will defer the toxicological review to EPA.

---

Author: damiller

Subject: Highlight

Date: 8/11/2006 10:28:35 AM

T Page 7-26: Section 7/6.2.

In Virginia, groundwater is considered a state water and shall be restored to its highest beneficial use (i.e., drinking water source). Although it may be unlikely that groundwater will be used as a potable source, that does not negate the need to restore the groundwater. Additional justification for any non-action is necessary. Please note this comment for various sections of the report that justify the groundwater risk by noting that groundwater is not used for a drinking water source.

---

Author: damiller

Subject: Note

Date: 8/7/2006 2:24:53 PM

 Section 8: Screening Level Ecological Risk Assessment.

The VADEQ will defer the technical review of the ecological risk assessment to EPA.

---

Author: damiller  
Subject: Highlight  
Date: 8/7/2006 2:38:35 PM  
T Page 8-36: Section 8.4.

Please send me a CD with this CAX Final Background Study on it. For reviews, this information is useful in electronic format.

---

Author: damiller

Subject: Note

Date: 8/11/2006 10:29:47 AM

Page 8-40. Section 8.4.1.

In this section, various VOCs/SVOCs are noted as having "background" concentrations. For example, acetophenone, the simplest of the aromatic ketones, is mainly a by-product of manufacturing processes. It is not a "naturally" occurring background contaminant. Additionally, unlike pesticides, it would be difficult to justify establishment of an anthropogenic level for this constituent as well. Please explain how this ketone and other VOCs/SVOCs are "background"?

---

Author: damiller

Subject: Highlight

Date: 8/11/2006 10:25:19 AM

**T** Please provide explanation of how statistics and 95% UCLs have been determined for datasets with 100% non-detects? The background datasets for the majority of SVOCs (additionally, please note, there is no such thing as background for an SVOC) have no detections. However, means and 95% UCLs are calculated. Please clarify.

---

## Page: 178

---

Author: damiller

Subject: Note

Date: 8/7/2006 2:52:18 PM

 Page 8-97: Section 8.4.1.8

As noted previously, VOCs/SVOCs are not normally considered to have "background" concentrations. It is much more likely that acetone was from lab contamination. Please check the background for this constituent.

---

Author: damiller

Subject: Note

Date: 8/7/2006 2:51:07 PM

 Page 8-97: Section 8.4.1.8.

It is more likely that the pesticides are from anthropogenic sources and not "background".

---

Author: damiller

Subject: Note

Date: 8/11/2006 10:30:25 AM

 Page 9-3: Section 9.1.

As previously note, groundwater use is not a valid determination for no action. If there is a risk, then an action or risk management determination with appropriate justification may be necessary.

---

Author: damiller

Subject: Note

Date: 8/11/2006 10:30:53 AM

 Page 9-5: Section 9.2

Please explain why there are no recommendations regarding the human health risk. Under both the CT and RME scenario, a risk to future residents was presented. As future residential use of this site is shown to drive a risk, controls on the site will be necessary or further evaluation and justification for risk management considerations may be necessary. As noted previously, groundwater use restrictions are not final remedies. Please provide recommendations on how the residential risks will be addressed.

---