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LETTER OFFERING COMMENTS ON DRAFT DECISION DOCUMENT FOR LIGHTER
AMPHIBIOUS RESUPPLY CARGO (LARC) 60 MAINTENANCE AREA FORT STORY VA
6/19/2008
COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



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COMMONWEALTH of VIRGINIA

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June 19, 2008

Joanna Bateman
Remedial Project Manager
Fort Eustis
U.S. Army Garrison
IMNE-EUS-PW-E (Bateman)
1407 Washington Boulevard
Fort Eustis, Virginia 23604-5306

**RE: Draft Decision Document
LARC 60 Maintenance Area
Fort Story, Virginia**

Dear Ms. Bateman:

The Virginia Department of Environmental Quality (DEQ) has received the *Draft Decision Document* (Decision Document) for the LARC 60 Maintenance Area site located at Fort Story, Virginia. The Decision Document, prepared by Malcolm Pirnie, Inc., was received by the DEQ (electronically) on October 23, 2007.

Thank you for providing the DEQ's Office of Remediation Programs the opportunity to review the above-referenced Decision Document. DEQ comments on the Decision Document were previously submitted to the Army from the Remediation Project Manager on December 21, 2007.

Subsequent to DEQ's Risk Assessor review, this office has the following comments:

General Comment:

1. The exposure assessment for this site changed between the original Remedial Investigation (RI) in 2002 and the RI Addendum in 2007. While the 2002 risk assessment evaluated a residential scenario and a drinking water scenario, the RI Addendum did not consider a future residential scenario or a drinking water scenario since these did not represent current or assumed near-term use.

Therefore, the No Further Action (NFA) decision in this Decision Document is only based on current land and water use assumptions. However, it should be noted that DEQ does not agree with this approach. If a residential exposure is not evaluated, DEQ expects that land use controls (LUCs) would be placed on the site to prevent future residential exposure. The alternative would be for the Army to evaluate a residential exposure and demonstrate that the LUCs are not needed. It is also DEQ Federal Facilities Restoration Program policy to return contaminated groundwater to levels consistent with unrestricted use (drinking water standards).

That being said, for the LARC 60 Maintenance Area site, the DEQ has enough information to conclude that a residential restriction would not be necessary based on soil contamination.

Per the attached *Revocation of the Draft Feasibility Study Report* letter dated May 30, 2008, the September 2007 Final Remedial Investigation Report Addendum recommended NFA for the LARC 60 site “based on the limited contamination detected in site groundwater and that no potential unacceptable human health or ecological risks were identified.” This recommendation for NFA was approved by the DEQ “provided that two additional groundwater monitoring events were conducted after finalization of the Decision Document to verify that contaminants of concern remain below EPA maximum contaminant levels (MCLs).”

Assuming that the comments below on metals contamination in groundwater are addressed, the two additional rounds of groundwater sampling should provide enough information to determine whether additional action is warranted for groundwater.

Per the June 18, 2008 conference call conducted between the Army (Joanna Bateman), Malcolm Pirnie, Inc. (Tony Pace), and the DEQ (Wade Smith), the two additional rounds of groundwater sampling are to be conducted semi-annually (6 months apart) and if there are any MCL exceedances, the remaining two groundwater sampling events will be conducted on an annual basis. Additionally, if there are any MCL exceedances, submittal of a Five-Year Review would be required.

Specific Comments:

2. Page 1-1, Section 1.3:

In addition to the volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs), metals have also been detected above Maximum Contaminant Levels (MCLs) and risk-based concentrations (RBCs) in groundwater. The RI calculated unacceptable hazard quotients (HQs) for iron and arsenic for a future drinking water scenario. The risk due to arsenic in a drinking water scenario also exceeded $1e-4$. Metals were not analyzed in the 2007 sampling event, so it is not clear whether there are still exceedances for metals. The follow-up sampling events should include metals analyses unless a sufficient rationale is presented to eliminate them.

3. Page 1-2, Section 1.5:

This section states that because this No Further Action remedy will not result in hazardous substances, pollutants, or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, a five-year review will not be required. However, this is inconsistent with subsequent sections of the document that state that if land use changes in the future, residential use would be re-evaluated.

4. Page 2-13, Section 2.5.3:

The site wide assessment of groundwater does not address the risks associated with metals in groundwater. The RI calculated unacceptable HQs for iron and arsenic for a future drinking water scenario. The risk due to arsenic in a drinking water scenario also exceeded $1e-4$. The risks due to metals were not addressed in the RI Addendum. The metals exceedances should be discussed in this section. The rationale for not addressing metals in the RI Addendum should be explained.

5. Page 2-16, Section 2.6:

This section states that the master plan for this site does not include base closure and that site use will remain industrial into the future. This section also states that residential use would be evaluated if site use changes in the future. This section should be expanded to discuss how the Army flags sites for future evaluation once a NFA decision is made.

6. Table 2-1:

The dates of the soil results should be included on this table.
The dates of the EPA RBCs should be noted since some of the criteria are out-of-date.

7. Table 2-5:

The dates of the groundwater results should be included on this table.
The two values that are presented for some of the groundwater results should be defined.
The dates of the EPA RBCs should be noted since some of the criteria are out-of-date.

8. Table 2-7:

The MCLs for Total Trihalomethanes should be 80 ug/L.

9. Table 2-8:

The RBC for trichloroethylene (TCE) has changed. The carcinogen class for TCE is incorrect. The most recent assessment for TCE (draft, 2001) classifies TCE as "highly likely to produce cancer in humans."

10. Table 2-12:

Note that some of the RBCs for soils have changed since 2001, including tetrachloroethylene (PCE), TCE, and the carcinogenic polycyclic aromatic hydrocarbons (PAHs).

Additional Comment:

11. DEQ review of this Decision Document does not preclude any future Natural Resource actions under CERCLA or OPA (43 CFR Part 11 and 15 CFR Part 990). As a Natural Resource Trustee, the Commonwealth of Virginia reserves the right to seek damages for injury or loss of the use of natural resources that may have been caused by a past release and/or an environmental cleanup of a CERCLA hazardous substance at this site. Note also that the DEQ did not solicit comments from other Trustee agencies at this time.

This letter is intended only as guidance and is not intended to be a case decision under the Virginia Administrative Process Act. If you would like to discuss this guidance, please contact me at (804) 698-4125 or wmsmith@deq.virginia.gov.

Sincerely,



Wade M. Smith
Remediation Project Manager
Office of Remediation Programs

Attachment: Revocation of the Draft Feasibility Study Report – May 30, 2008

cc: Pat McMurray, DEQ, CO