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E-MAIL TRANSMITTING MINRO REVISIONS TO DRAFT DECISION DOCUMENT LIGHTER
AMPHIBIOUS RESUPPLY CARGO (LARC) 60 AREA FORT STORY VA
10/21/2008
COMMONWEALTH OF VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

file: 6c.19.b

Bateman, Joanna G Ms CIV USA IMCOM

From: Smith,Wade [wmsmith@deq.virginia.gov]
Sent: Tuesday, October 21, 2008 9:39 AM
To: Pace, Tony
Cc: Bateman, Joanna G Ms CIV USA IMCOM; Michel, Amber A Miss CTR USA IMCOM
Subject: RE: Fort Story: LARC 60 Decision Document RTCs

Attachments: Final DD - Section 1-WMS.doc



Final DD - Section
1-WMS.doc (...)

Thanks, looks great!

Minor revisions attached.

I will prepare the approval letter and get that out to you today.

Thanks again,

wade

-----Original Message-----

From: Pace, Tony [mailto:TPace@PIRNIE.COM]
Sent: Monday, September 08, 2008 9:59 AM
To: Smith,Wade
Cc: Bateman, Joanna G Ms CIV USA IMCOM; Michel, Amber A Miss CTR USA IMCOM
Subject: Fort Story: LARC 60 Decision Document RTCs

Wade,

We have revised the LARC 60 DD based on comments received from VDEQ. We have attached your Dec 2007 comments and the revised sections, tables, and figures that address them. Since your comments were generally in redline/strikeout format, we have no official response to comments package for them. We adopted almost all of them with the exception of a few where we provided a comment box.

We responded directly below to the VDEQ risk assessor's latest comments which were delivered to us by email on 8/29/08 .

Let us know if you have any additional comments so that we can address and finalize the LARC 60 DD. Thanks.

VDEQ Risk Assessor comments:

I have reviewed the Army's responses to DEQ's comments on the Draft Decision Document and the revised pages. Several of the responses indicate that the preferred remedy has been changed from "No Further Action" to "Land Use Controls." However, it is not clear from the revised pages whether the proposed remedy is actually land use controls or just monitoring. If the intent is to place a prohibition on drinking water from the site, then land use controls is an appropriate title for the remedy. If this is the case, the process for documenting and implementing the control should be explained in the Decision Document. If the intent is just to monitor to determine whether the contaminants are below MCLs, then the proposed remedy should be called "Monitoring." If both are intended, the remedy should be called "Land Use Controls with Monitoring."

Response: We have revised the remedy to "Land Use Controls with Monitoring". The change from No Further Action was the result of the exceedences of the MCL for arsenic and the RBCs for several other metals in past GW sampling events at the site. The monitoring now includes VOC, SVOC, and metal analysis. If no MCLs are exceeded during the two planned sampling events, then the remedy will be re-assessed with a probable change back to "No Further Action".

Comment 9: I understand that it is impractical to continually update RBCs as documents are finalized. However, the cancer classification for TCE on Table 2.8 is incorrect. To my knowledge, TCE has never had a "D" classification. Although the classification is under review at this time, the classification that was used on Table 2.9 "B2" is more correct. The classification should be consistent between the soil and groundwater tables. Note that Table 2-12 also classifies TCE as "D." These tables should be corrected.

Response: Agreed. Tables have been revised to reflect that TCE has a "B2" cancer classification.

Anthony Pace

Associate

Malcolm Pirnie, Inc.

701 Town Center Drive, Suite 600

Newport News, Virginia 23185

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Cell: 757-532-4386

tpace@pirnie.com

From: Smith, Wade [mailto:wmsmith@deq.virginia.gov]
Sent: Friday, August 29, 2008 12:07 PM
To: joanna.g.bateman@us.army.mil
Cc: Pace, Tony; McMurray, Patricia
Subject: Fort Story: LARC 60 Decision Document RTCs

Per our conversation on 8/28/08, the DEQ is pleased to provide the following comments:

DEQ's Remediation Project Manager Comments: 12/21/07 (attached);

RTCs - Not yet received.

Wade M. Smith

Remediation Project Manager

Virginia Department of Environmental Quality

Office of Remediation Programs

Phone: (804) 698-4125

Fax: (804) 698-4234

wmsmith@deq.virginia.gov

DEQ's Risk Assessor Comments: 6/19/08 (attached);

RTCs - Received: 6/26/08.

I have reviewed the Army's responses to DEQ's comments on the Draft Decision Document and the revised pages. Several of the responses indicate that the preferred remedy has been changed from "No Further Action" to "Land Use Controls." However, it is not clear from the revised pages whether the proposed remedy is actually land use controls or just monitoring. If the intent is to place a prohibition on drinking water from the site, then land use controls is an appropriate title for the remedy. If this is the case, the process for documenting and implementing the control should be explained in the Decision Document. If the intent is just to monitor to determine whether the contaminants are below MCLs, then the proposed remedy should be called "Monitoring." If both are intended, the remedy should be called "Land Use Controls with Monitoring."

Comment 9: I understand that it is impractical to continually update RBCs as documents are finalized. However, the cancer classification for TCE on Table 2.8 is incorrect. To my knowledge, TCE has never had a "D" classification. Although the classification is under review at this time, the classification that was used on Table 2.9 "B2" is more correct. The classification should be consistent between the soil and groundwater tables. Note that Table 2-12 also classifies TCE as "D." These tables should be corrected.

Patricia McMurray

Scientist, Office of Remediation Programs

Virginia Department of Environmental Quality

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-----Original Message-----

From: Smith,Wade
Sent: Thursday, June 26, 2008 2:49 PM
To: McMurray,Patricia
Subject: FW: LARC 60 DD Response to Comments

Please let me know if your comments have been adequately addressed.

Thanks,

wade

-----Original Message-----

From: Pace, Tony [mailto:TPace@PIRNIE.COM]
Sent: Thursday, June 26, 2008 1:01 PM
To: Smith,Wade
Cc: Bateman, Joanna G Ms CIV USA IMCOM
Subject: LARC 60 DD Response to Comments

Wade,

I have attached our responses to your comments on the Draft Decision Document for the LARC 60 site. Also attached are the revised sections in a redline/strikeout format for your review. Let us know if you have any additional issues that need clarification. Thanks.

Anthony Pace

Associate

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