



COMMONWEALTH of VIRGINIA

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June 29, 2009

Mr. Scott Park, P.E.
NAVFAC Mid Atlantic
9742 Maryland Ave. Bldg N-26, Rm 3208
Norfolk, VA 23511-3095

Subject: Naval Amphibious Base Little Creek

*Draft Revised Ecological Risk Assessment Work Plan and Sampling and Analysis Plan
SWMU 7b – Desert Cove*

Dear Mr. Park:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft Revised Ecological Risk Assessment Work Plan and Sampling and Analysis Plan for SWMU 7b – Desert Cove* dated May 2009. Based on the VDEQ review we offer the following comments:

1. General Comment: How is tributyl tin (TBT) to be assessed? The mechanisms used to evaluate the total tin data to determine whether or not TBT assessment is needed should be discussed early in this document and any analytical SOPs specific to TBT should be identified where necessary throughout the document.
2. Worksheet 1: Please delete the VDEQ signature line. VDEQ does not sign SAP documents.
3. Worksheet 7: Add Adina Carver to the table.
4. Worksheet 10: Please label Intercove Road and Signal Point Road on Figure 2 as they are used as points of reference in the text.
5. Worksheet 11: In the 3rd bullet's 3rd sub-bullet please insert the words "indicator parameter" before the word "data" to clearly define the limited water quality data to be collected. Please provide the same revision in the 5th sentence of the 4th bullet and include the depths (top, mid, bottom) to be sampled. Please provide the surface water quality indicator parameter qualification elsewhere in the document as necessary.
6. Worksheet 12-1: As this is the only worksheet is it necessary to label it 12-1?

7. Worksheet 14, Project Tasks: In the 2nd bullet please add a statement to the last sentence addressing the management of the decontamination fluids in accordance with state and federal regulations.
8. Worksheet 15-3: Please add tin to the table or explain why it is left off the table.
9. Appendix A, Completeness Checklist, EPA QA/R 5 – A.9: Worksheet 29 does not appear to identify “how long” project information should be kept nor does it seem to address “back up plans for records stored electronically”. Please clarify.
10. Appendix A, Completeness Checklist, EPA QA/R 5 – B.1: Worksheet 17 doesn’t appear to address “what to do if sampling sites become inaccessible”. Please clarify. Worksheet 37 doesn’t appear to specify “what information is critical and what is for informational purposes” nor does it identify “sources of variability” and how “variability should be reconciled with project information”. Please clarify.
11. Appendix A, Completeness Checklist, EPA QA/R 5 – B.6: Worksheets 22 and 25 do not appear to “note availability and location of spare parts” nor do they appear to require the “effectiveness of [the] corrective action [be] determined and documented”. Please correct.
12. Appendix A, Completeness Checklist, EPA QA/R 5 – B.8: While Worksheets 22 and 24 appear to identify critical supplies and consumables they do not note the “supply source” nor provide “procedures for tracking, storing, and retrieving these materials.” Please correct.

This concludes VDEQ’s comments on this document at this time. Should you have any questions concerning these comments, please give me a call at (804) 698-4464.

Sincerely,



Paul E. Herman, P.E.

Remediation Project Manager

cc: NABLC Tier 1 (electronic copy)
Milt Johnston, TRO
NABLC Correspondence File