

## **Marrow, Monica/VBO**

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**Sent:** Thursday, August 27, 2009 10:43 AM  
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**Cc:** Pluta.Bruce@epamail.epa.gov  
**Subject:** NABLC - SWMU 7b Revised ERA Work Plan and SAP (Draft) - EPA Comments (email)

**Subject Document: Draft Revised Ecological Risk Assessment Work Plan and Sampling and Analysis Plan for SWMU 7b, Desert Cove, Naval Amphibious Base Little Creek, Virginia Beach, Virginia, May 2009**

Folks,

Document Summary:

- 5/15/2009 Transmittal Letter from CH2MHILL- Received draft version (hardcopy & CD-ROM) of the document for review and comment.

Email Action: EPA (mailcode 3HS11 and 3HS41) has reviewed the subject document and provide the following comments for consideration.

1. **SAP Worksheet #9-1, Comments/Decisions, 3rd Paragraph, Page 28** The text states "The data evaluation suggested the data collected from the connector channel and the cove may be risk manageable." The text should detail why these areas may be addressed through risk management strategies.
2. **SAP Worksheet #9-2, Comments/Decisions, 5th Paragraph, Page 32** The presence of PAHs is attributed to site use and storm water run-off and therefore, toxicity testing would not "...provide an accurate representation of ecological risk resulting from activities relating to SWMU 7b." EPA Superfund risk assessment clearly indicates that risk at a site needs to be assessed regardless of attribution. Toxicity testing is not a tool to be used to determine attribution, but one that would help to assess risk present at the sample locations. The logic presented in cited discussion is irrelevant when trying to assess risk.
3. **SAP Worksheet #9-2, Action Items, Page 32** Change "BTAG" to "USEPA".
4. **SAP Worksheet #9-3, Comments/Decisions, 2. Pier Area, 7th Bullet, Page 35** The statement is made "The Team agreed arsenic, selenium, silver, and PAHs could be removed from the COC list." As stated in a preceding bullet, PAHs are identified as COCs. Removal of any contaminant as a COC based on reasons other than risk related reasons is premature (if nothing else, these compounds may either confound later analyses or impact the toxicity of known site-specific contaminants).
5. **SAP Worksheet #9-3, Comments/Decisions, 2. Pier Area, 8th Bullet, Page 35** The statement is made "The RQ will be used for COCs to identify the areas of high and low concentrations in the area not dredged during the MILCON action." The text must detail how the RQ (risk quotient) is calculated and how it differs from the HQ (hazard quotient).
6. **SAP Worksheet #9-3, Consensus Decisions, Page 35** The text states "The Team agreed only the primary metal COCs would be retained for further evaluation at SWMU 7b." The text should document the basis for this decision.

7. **SAP Worksheet #10, Environmental Questions Answered by this Project, 2nd Question, Page 39** It is noted that “Surface sediment samples will be collected from 7 discrete locations within the dredged portion of the Pier Area to evaluate post-dredge conditions.” Given the potential heterogeneity of contamination throughout the sediment, the document must provide additional rationale to demonstrate that seven discrete samples will be sufficient for this evaluation.
8. **SAP Worksheet #10, Environmental Questions Answered by this Project, 2nd Question, Page 40** In the non-dredged area, eight discrete surface sediment samples will be collected in the vicinity of the two sample locations identified as high concentration areas. Again, the document must provide additional rationale to demonstrate that eight discrete samples will be sufficient for this evaluation.
9. **SAP Worksheet #10, Environmental Questions Answered by this Project, 2nd Question, Page 40** The high concentration areas are defined as those where the RQ > 1 and/or HQ > 1.5. Again, the calculation of the RQ needs to be explained. Also, the rationale supporting the use of a HQ > 1.5 as a criteria needs to be detailed (See Comment 5 above).
10. **SAP Worksheet #10, Environmental Questions Answered by this Project, 2nd Question, Page 40** In the non-dredge area, “Two discrete surface sediment samples will be collected...in the vicinity of two locations identified as low concentration areas (RQ < 1 and individual HQ < 1.5....” It is not clear why two samples are sufficient here, when eight samples were the recommendation for the high concentration areas. The rationale for this sample number needs to be detailed.

Path Forward: Navy to provide Responses to Comments

**NOTE: No letter documenting EPA's comments on the subject document will be provided. EPA will issue a formal acceptance letter once the final hardcopy version is received, reviewed and approved.**

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