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LETTER AND COMMENTS FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
ON RESPONSE TO COMMENTS REGARDING DRAFT REMEDIAL INVESTIGATION
REPORT FOR SITE 11A BUILDING 3033 NAS LITTLE CREEK VA
07/06/2009
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

TDD (804) 698-4021

www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

July 6, 2009

Mr. Scott Park, P.E.
NAVFAC Mid Atlantic
9742 Maryland Avenue
Code EV3, Bldg. N-26, Rm.3208
Norfolk, Virginia 23511-3095

Subject: Naval Amphibious Base Little Creek
Response to Comments - Draft Remedial Investigation Report
IR Site 11a, Building 3033 Former Waste Oil Tank

Dear Mr. Park:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Response to Comments - Draft Remedial Investigation Report for IR Site 11a, Building 3033 Former Waste Oil Tank* dated May 2009. The majority of the responses provided adequately address their associated VDEQ comment. However, the response provided for VDEQ Comment 18 prompted additional consideration by VDEQ regarding the definition of Site 11a and the completeness of the human health risk assessment conducted to date.

Site 11a has been defined as a former underground waste oil storage tank. During the July 2008 Partnering Meeting the Team developed the following Consensus Statement, "Soil data collected during the Site 11a RI was evaluated by the Team. Following the data evaluation, the Team agreed the source at Site 11a is the former UST and there was no release to soil. Consequently there is no pathway to surface soil and a quantitative HHRA and an ERA for soil is not necessary."

The Draft RI for Site 11a was issued in September 2008. In October 2008 VDEQ asked for information concerning the use of Building 3033 which resulted in an October 23, 2008 email containing the following, "Al Gregg called me back today with information on Building 3033 at Site 11a. It was a vehicle repair facility with 12 bay doors." The logical conclusion is the UST was used by the 12 bay vehicle repair facility.

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As TCE and PCE were detected in groundwater and their highest concentrations were found in the vicinity of the former UST, the UST was assumed to be the source of the groundwater contamination. However, soil samples collected around Site 11a indicate the presence of TCE, PCE, and other VOCs in surface soils at levels above the 2007 RBCs for soil to groundwater migration. While the UST is not likely to have contributed to the VOC contamination detected in surface soils, the 12 bay vehicle repair facility may have been a contributor. As the UST was likely a component of the vehicle repair facility, it would be appropriate to consider Site 11a to be the former UST and the 12 bay vehicle repair facility. The VOCs detected in surface soils may be associated with the operation of the vehicle repair facility thereby justifying the inclusion of surface soils in the HHRA for Site 11a.

Please revise the Human Health Risk Assessment provided in the Draft Remedial Investigation Report for Site 11a to include soil and all associated receptor/pathway scenarios and please revise the RTCs, as necessary, to address this concern. Please rename Site 11a to include the former 12 bay vehicle repair facility. The new name for Site 11a could be "Former 12 Bay Vehicle Repair Facility and Waste Oil Tank".

This concludes VDEQ's comments concerning the RTCs document at this time. If 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)
NABLC Correspondence File
Pat McMurray, VDEQ Waste Division-ORP
Kyle Newman, VDEQ Waste Division-ORP
Milt Johnston, VDEQ-TRO