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EMAIL AND COMMENTS FROM U S EPA REGION III REGARDING DRAFT FEASIBILITY STUDY FOR SITE 11A JEB LITTLE CREEK VA
04/15/2011
U S EPA REGION III

Monica Marrow

From: Boylan.Jeffrey@epamail.epa.gov
Sent: Friday, April 15, 2011 12:24 PM
To: Peed, Bryan K. CIV NAVFAC MIDLANT Norfolk; Livingston, David/VBO; peherman@deq.virginia.gov; Landin, Cecilia/VBO; Carver, Adina/VBO; Boylan.Jeffrey@epamail.epa.gov
Cc: Ioven.Dawn@epamail.epa.gov
Subject: JEB Little Creek - Feasibility Study Site 11a (Draft) - EPA Comments (email)

Subject Document: Draft Feasibility Study Site 11a - Building 3033 Former Vehicle Repair Facility and Waste Oil Tank Joint Expeditionary Base Little Creek, Virginia Beach, Virginia, April 2010 (February 2011 Revision)

Folks,

Document Summary:

- February 4, 2011 Transmittal Letter from CH2MHILL- Received revised draft version for review and comment.

Email Action: EPA (mailcode 3HS11 and 3HS41) has reviewed the subject document and offers the following comments:

GENERAL COMMENT

1. None of the proposed remedies -- Enhanced Reductive Dechlorination, In Situ Chemical Oxidation with ERD, and Air Sparging/Soil Vapor Extraction -- aggressively addresses gw contamination at the site. Either an active remedy (such as pump-and-treat) should be evaluated in the FS or an explanation provided for its dismissal from consideration.

2. In Section 3, please add language to document the basis for technologies (6) that were screened out in the FS. See table 3-1

3. **PAGE 1-1**

According to the second paragraph, there are "no unacceptable human health risks associated with ... indoor air" at this site. This point is reiterated on page 1-5 of the report. However, when reviewing the RI Addendum for Site 11a (October 2010), which assessed the potential for vapor intrusion threats, EPA did have a few concerns:

- Although indoor air concentrations of VOCs measured for the RI Addendum were mostly unremarkable, subslab levels were, in fact, noteworthy: PCE at up to 960 ug/m3 and TCE at up to 270 ug/m3.
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- Sampling of the occupied barracks at Site 11a was fairly limited, with only 2 of 9 samples collected from locations directly above the gw plume. Further, only a single round of sampling was conducted, which may not have accurately characterized indoor air conditions at this building.
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- To account for uncertainty in the Cal EPA Cancer Slope Factor for TCE (a risk-driver at this site), EPA recommends truncating the acceptable risk range at 1E-05 (rather than 1E-04). Further, under a long-term residential exposure scenario, strong evidence suggests that non-cancer threats supersede cancer endpoints as indoor air concentrations of TCE approach 5 ug/m3; this would correspond to 25 ug/m3 for short-term residential exposure, using the methodology employed in the RI Addendum for Site 11a. These points were not considered in the RI Addendum, and would affect conclusions associated with subslab data. (Note that the report extrapolates future potential risks based on subslab VOC concentrations.)
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Based on these concerns, the conclusion of "no unacceptable human health risks associated with ... indoor air" at Site 11a has not been clearly demonstrated. Consequently, the FS should contain language indicating that future

development at the site or a change in current land use conditions will necessitate either a more comprehensive vapor intrusion study or mitigative measure to ensure that the potential threat is intercepted.

Additional comments (if any) on Appendix C - ARARs will be provided.

Path Forward: Navy to provide responses to comments.

NOTE: No letter documenting no 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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