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NAB LITTLE CREEK
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EMAIL AND COMMENTS FROM U S EPA REGION III REGARDING DRAFT REMEDIAL
INVESTIGATION ADDENDUM REPORT FOR SITE 11A JEB LITTLE CREEK VA
10/28/2010
U S EPA REGION III

Monica Marrow

From: Boylan.Jeffrey@epamail.epa.gov
Sent: Thursday, October 28, 2010 9:32 AM
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: loven.Dawn@epamail.epa.gov
Subject: NAB Little Creek JEBLC-FS: Site 11a RI Addendum (Draft) - EPA Comments (email)

Subject Document: Draft Remedial Investigation Addendum Report for Site 11a, Naval Amphibious Base Little Creek Joint Expeditionary Base Little Creek - Fort Story, Virginia Beach, Virginia, September 2010

Folks,

Document Summary:

- 09/28/2010 Transmittal Letter from CH2MHILL- Received draft version (3 hardcopies and 3 CD-ROMs) for review and comment.

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

- For TCE, the Cal EPA Cancer Slope Factor was used to generate PALs. As stated in comments submitted previously for this site (11/13/2008 and 4/21/2010), EPA has recommended truncating the acceptable risk range for TCE at 1E-05 (rather than 1E-04) to account for uncertainty in the Cal EPA value. 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 report. These points were not considered in the Addendum, and would affect conclusions associated with subslab data, where TCE was reported at up to 270 ug/m³. (Note that the report extrapolates future potential risks based on subslab VOC concentrations.) EPA suggests adding some language to the addendum (possibly in section 4.2.1 Methodology) acknowledging the TCE non-cancer endpoint.
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- Although indoor air concentrations of VOCs measured during this investigation were mostly unremarkable, subslab levels were, in fact, noteworthy: PCE at up to 960 ug/m³ and TCE at up to 270 ug/m³. Given this, EPA don't necessarily agree with the conclusion that no additional investigation is necessary. Since sampling of the occupied barracks was fairly limited, with only 2 of 9 samples collected from locations directly above the gw plume, a single sampling effort may not have accurately characterized indoor air conditions at this building. Because this potential exposure is real (rather than hypothetical), further sampling of indoor air should be considered. EPA suggests rewording section 6.2 Recommendations to clearly indicate that VI monitoring will be included in the LTM monitoring plan. Also consider revising the first sentence of this section to say "Base upon the results of the risk assessment, no further action is recommended at this time at Site 11a.
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- In section 4.1.3 Outdoor Air Data, the results presented regarding outdoor are somewhat confusing and suggest conclusions that indoor air concentrations are affected by the outdoor air or an indoor source. EPA suggests a conference call with the partnering team to revise the second and third paragraphs of this section.

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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