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NAB LITTLE CREEK
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LETTER AND VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY COMMENTS ON
THE DRAFT REMEDIATION AREA DELINEATION SEDIMENT SAMPLING WORK PLAN AND
SAMPLING AND ANALYSIS PLAN SOLID WASTE MANAGEMENT UNIT 3 (SWMU3) PIER 10
SANDBLAST YARD AND SOLID WASTE MANAGEMENT UNIT 7B (SWMU7B) SMALL BOATS
SANDBLAST YARD (DESERT COVE) JEB LITTLE CREEK VA

11/21/2012

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



COMMONWEALTH of VIRGINIA

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November 21, 2012

Mr. Bryan Peed
NAVFAC Mid Atlantic
9742 Maryland Avenue
Code OPHREV4, Bldg. N-26, Rm.3300
Norfolk, Virginia 23511-3095

Subject: Joint Expeditionary Base Little Creek – Fort Story
*Draft Remediation Area Delineation Sediment Sampling Work Plan and
Sampling and Analysis Plan
SWMU 3 – Pier 10 Sandblast Yard and
SWMU 7b – Small Boats Sandblast Yard (Desert Cove)*

Dear Mr. Peed:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft Remediation Area Delineation Sediment Sampling Work Plan and Sampling and Analysis Plan for the SWMU 3 – Pier 10 Sandblast Yard and SWMU 7b – Small Boats Sandblast Yard (Desert Cove)* dated October 2012. Based on this review the following comments are offered.

1. Executive Summary: In the 5th paragraph the term “constituents of concern (COC)” is used. Shouldn’t that read “chemicals of concern”? In the 5th paragraph please revise the sentence discussing the layer of petroleum-like material to note it is “not related to the SWMU 3 sandblasting activities”. In the 6th paragraph please consider revising the 2nd sentence as follows, “During these operations the sandblasting residue accumulated on the ground surface. Historical releases at SWMU 7b likely occurred when runoff containing sandblast residue discharged to Desert Cove.” In the last sentence of the 6th paragraph, please change the 1st use of the word “delineate” to “define”.
2. Worksheet 10-1, Ecological Risk Summary: In the 3rd sentence of the 2nd paragraph it seems to say a mercury/ABM content correlation was not performed. Please consider replacing “were not correlated with ABM content” with “did not correlate with ABM content” or “showed little correlation with ABM content”. At the end of the sentence, please insert a comparator, x of y samples, to show the spatial limits. Please reword the end of the last sentence as follows, “not considered a result of *this* CERCLA release”.

3. Worksheet 10.1, Delineation of Lateral and Vertical Extent of Impacted Sediment: In the 7th sentence please add the depth of the sediment cores collected from each grid.
4. Worksheet 10-1, Non-time Critical Removal Action: When discussing grids 509, 551, and 559 even though ABM is not a PRG it may not hurt to note they contained less than 1% ABM.
5. Worksheet 10-1, Project Objectives: Please consider qualifying the term "vertical extent" in the 2nd sentence as follows, "to re-define the vertical extent of metals contamination (PRGs) within the CERCLA sediment remediation area". Please reword the opening of the 3rd sentence as follows, "A layer of petroleum-like material, not related to this CERCLA release,...".
6. Worksheet 11: Please consider replacing the term "six-inch-interval sediment samples" with "six-inch-long sediment samples". This change should make it clear that at each prescribed interval a 6-inch-long sample of sediment will be collected.

This concludes VDEQ's comments concerning this 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
Milt Johnston, VDEQ-TRO (electronic copy)