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NAB LITTLE CREEK
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LETTER TRANSMITTING U S EPA REGION III'S COMMENTS ON FINAL COMMENT RESOLUTION SUMMARY NAB LITTLE CREEK VA
9/21/2000
U S EPA REGION III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

September 21, 2000

Commander, Atlantic Division
Naval Facilities Engineering Command
Environmental Quality Division, Code: 1823
1510 Gilbert Street
Norfolk, Virginia 23511-2699
Attn.: Robert Schirmer

SUBJECT: Review *Final Comment Resolution Summary SERA*
NAB Little Creek, Virginia Beach, Virginia

Dear Mr. Schirmer:

The EPA has reviewed the *Final Comment Resolution Summary Draft* , Naval Amphibious Base, Little Creek, Virginia Beach, Virginia. The document was prepared for the Navy by CH2M HILL.

GENERAL COMMENTS

1. As a general comment , but not related to finalization of the SERA, the issue of potential contamination in "large bodies of water" at NAB Little Creek still needs to be addressed. Specifically at NAB Little Creek, these receiving water bodies include Little Creek, Little Creek Cove, Little Creek Harbor, and Desert Cove. The SERA indicates that several sites (Site 7, Site 8, and SWMU 3) may directly contribute contamination to some of these waters and that, in the past at least one site (Site 11) may have had a discharge of potential contamination to these waters. Site 11 does not have to be carried forward, however because of the uncertainity (see comment 3 below) of the volume estimates used in the evaluation of Site 11, there still exists the potential for historical discharge of contaminants from Site 11 to impact the sediments in Little Creek Cove. For the sites that will be carried forward, the step 3 problem formulation and report should document the potential contamination in "large bodies of water" related to each site. The use of current contaminant levels in media other than the sediment and surface water to minimize the potential for impacts in receiving water bodies within identified contaminant migration pathways is not appropriate in step 3. This approach does not take into account either the potential or actual historical discharges of contaminants to receiving water bodies and the potential risks to ecological receptors that those contaminants present today. As noted in previous discussions, since these water bodies are within the migration pathways of known sources of contamination BTAG recommends sampling of the surface water and sediment to determine if site related contamination is present and evaluate any associated risk. Clearly, the issues of historical discharges and of

potential contamination of "large-bodies of water" are policy concerns which need to be addressed at Tier II level.

SPECIFIC COMMENTS

2. The response to comment 8 was that the comment was withdrawn once the approach was verbally clarified. Upon verification of this approach and re-evaluation of the comment and the referenced section (3.3.3.1), the response does not appear adequate. The original comment essentially questioned the derivations of the different BAF/BCF values used in this screening ERA (SERA). The referenced section generally indicates that literature derived values were used when available. However, upon further examination it was noted that the value selected for PCBs from soil to soil invertebrates is listed as 15.91 in Table 3-5. The range of values from the same reference for the 15.91, was 0.00 to 65.227. Because this is a SERA, the author is not clear why the maximum uptake factor of 65.227 was not selected for Table 3-5. This also raises questions about the selection of other BAF/BCF values for this assessment. The author needs to clearly document the selection process for the BAF/BCF values, particularly when the value used is not the maximum value or the 90% value from the literature. In those cases where the maximum BAF/BCF was not utilized and the chemical was retained as a COPC, there is no need to revise text or tables. In cases where the maximum value or the 90% value was not utilized, the COPC should be retained at least through the problem formulation phase of the baseline ERA (BERA).

3. The response to comment 26 (and NAB Little Creek Draft SERA Verbal Comments - No. B.k.) and the revised text still identify at least two areas of uncertainty which could have an impact on the transport of waste from Site 11 through the storm sewer to Little Creek Cove. First, the low volume of wastes is estimated at 300 gallons. This estimate only has to be off by a factor of 2 to 3 before the volume would be enough to flow out of the tank. Therefore, it is important to document the level of confidence in the estimates of waste flow to the tank. Second, the last sentence in this section (page 9-2) raises the uncertainty about existence of clean-out operations. A reasonable estimate of clean-out volume of liquid would be greater than 2 or 3 times the original volume. This would mean that the volume of liquid in the neutralization tank would be sufficient to cause outflow from the tank to the storm sewer and potentially Little Creek Cove. While the tank and piping leading to the storm sewer have been removed, it is still a valid concern that historic contamination from this site could have reached Little Creek Cove and still remains, most likely in sediments, in concentrations that could present risk to ecological receptors. A brief write-up could be added to the uncertainty section of the SERA, under a new bullet: Assumptions in Conceptual Models.

4. Comment 29 referred to the sentence, "an interim removal action final closeout report was issued in May 1996 that documented the removal action." Contrary to the response to this comment that this sentence would be deleted, this sentence still remains. Thus the BTAG recommendation that the conclusions of this report and the supporting data be discussed in this SERA is still valid.

5. Comment B.q. - The response to this comment refers to the receptor species selection bullet in the uncertainties chapter (page 14-3). This section discusses reptiles and amphibians. While it is clear that these two receptor groups may have the most uncertainty associated with them, this does not mean the other receptor groups are uncertainty free. Some mention should be made about the uncertainty of utilizing a single receptor species to represent an entire feeding group. This, as well as any additional uncertainties, must be addressed in the BERA. These uncertainties will be more significant as the BERA is likely to focus on a more limited set of receptors.

If you have any questions concerning any of these comments, please call me (215) 814-3364.

Sincerely,

Bruce W. Beach
Remedial Project Manager

cc: Robert Weld, VDEQ
Randy Sawyer, NWSY
Scott MacEwen, CH2M HILL
Donna Caldwell, CH2M HILL