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LETTER AND THE U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY COMMENTS ON THE DRAFT FOCUSED FEASIBILITY STUDY
FOR GROUNDWATER SOLID WASTE MANAGEMENT UNIT 3 (SWMU 3) PIER 10
SANDBLAST YARD JEB LITTLE CREEK VIRGINIA BEACH VA
09/18/2014
CH2M HILL



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September 18, 2014

Mr. Paul E. Herman, P.E.
Remedial Project Manager
Virginia Department of Environmental Quality
629 East Main Street, 4th Floor
Richmond, VA 23219

Subject: Response to Comments, *Draft Focused Feasibility Study, SWMU 3 – Pier 10 Sandblast Yard*, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia.

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received from VDEQ via .pdf markup on the *Draft Focused Feasibility Study, SWMU 3 – Pier 10 Sandblast Yard*, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia.

General: All suggested editorial changes were incorporated.

1. Page 3, Section 1.6, 4th paragraph, 1st sentence: The shallow aquifer geology is likely a mix of the dredge spoil and pre-1937 land formation, whatever that was.

Response: The 1st sentence was revised to read: “The land where SWMU 3 is located and the surrounding area were created from the placement of dredged material between 1937 and 1954; thus, the shallow aquifer geology is likely a mix of dredge spoil and pre-1937 land formation and not representative of the upper Holocene and Pleistocene unconsolidated fine sand and silt deposits of the Columbia aquifer.”

2. Page 3, Section 1.6.1, 2nd paragraph, 3rd sentence: Were the SVOCs above the screening levels?

Response: The following was added after the 3rd sentence: “Dibenzofuran was the only SVOC that was detected above screening values. Although identified as a contaminant of potential concern, the SI concluded dibenzofuran was not site-related and therefore SVOCs were not analyzed in groundwater samples during the RI and SRI. Dibenzofuran was analyzed in groundwater samples during pre-FS groundwater sampling conducted in January and September 2008 to confirm its presence or absence in groundwater. Dibenzofuran was not detected in groundwater (**Appendix A, Table A-1**).”

3. Page 4, Section 1.6.4, 3rd paragraph, 3rd sentence: Shouldn't the highlighted compounds cancel out? Chromium, cobalt, and 1,1-DCA aren't part of the unacceptable carcinogenic risk and non-cancer hazard list yet are COPCs and 1,2-DCA, TCE, 1,2-DCE, and VC are risk drivers but not COPCs.

Response: 1,2-DCA, TCE, 1,2-DCE, and VC were identified as risk drivers following the HHRA conducted in 2009. Because this risk assessment was completed in 2009, as part of development of

the Focused FS, compared to updated risk-based screening values (November 2013 tap-water RSLs), MCLs, and toxicity values. In addition to previously identified COPCs, chromium, cobalt, and 1,1-DCA were identified as new COPCs. A new paragraph was started after the 4th sentence. The 1st and 2nd sentences of the new paragraph were revised to read: "As part of development of this Focused FS, a review of updated risk-based screening values (November 2013 tap-water RSLs), MCLs, and toxicity values was performed using groundwater data collected as part of the SI, RI, and SRI. As a result, in addition to previously identified COCs, 1,1-DCA, chromium, and cobalt were identified as new COPCs that may contribute to an unacceptable risk or hazard in groundwater and may be COCs."

4. Page 5, Section 1.6.4: Where's the bullet for the 3rd COPC 1,1-DCA?

Response: 1,1-DCA was retained as a site-specific COC and therefore a risk management bullet was not warranted. Based upon groundwater data collected in August 2014 and the results of an updated risk assessment, concentrations of 1,1-DCA in groundwater were determined to not pose potentially unacceptable risk to human health and therefore this constituent is no longer considered a site-specific COC. The results of the August 2014 sampling as well as the updated risk assessment have been added throughout the draft final Focused FS.

5. Appendix A, References: VDEQ will provide the most up-to-date version of this preliminary identification document.

Response: Comment noted. Following receipt of up-to-date version the reference will be revised.

If you have any questions concerning these responses to comments, please feel free to contact me at (757) 671-6280.

Sincerely,



Nathaniel Price, P.E.,
Project Manager

cc: Mr. Jeffrey Boylan/ USEPA
Mr. Matthew Stepien/ NAVFAC Mid Atlantic
Ms. Cecilia Landin/CH2M HILL