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September 18, 2007

Mr. Jeffrey Boylan
Remedial Project Manager
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103

Subject: Response to Comments, *Draft Remedial Investigation Work Plan, Site 11a – Building 3033, Former Waste Oil Tank* at Naval Amphibious Base Little Creek, Virginia Beach, Virginia.

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received from USEPA on the *Draft Remedial Investigation Work Plan, Site 11a – Building 3033, Former Waste Oil Tank* at Naval Amphibious Base Little Creek, Virginia Beach, Virginia:

1. Section 6.2, Remedial Investigation Report: The sentence “Groundwater chemical concentrations at Site 11a exceeding the MCL and background UTL will be retained for further evaluation” could imply to the reader that concentrations below the MCL and UTL will not be retained in the risk analysis. For risk analysis, concentration data should be compared to RBCs. Clearly point out in the work plan, that comparison to MCLs and UTLs is being used for the nature and extent of contamination and not as part of the HHRA.

Response: The sentence was amended to read “Groundwater chemical concentrations at Site 11a exceeding the MCL and background UTL will be retained for further evaluation in the nature and extent of contamination discussion; alternative screening criteria will be used for risk analysis, as discussed in Section 6.3.1.1.”

2. Section 6.3.5.3, Exposure Points and Exposure Routes; Figure 6-1, Conceptual Exposure Model for Potential Human Exposure; and Appendix H, Human Health Risk Assessment Tables: The work plan proposes to evaluate vapor intrusion threats under a current land-use scenario only. However, like potential risks from other exposure pathways and routes,

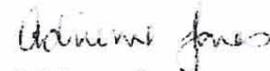
consideration should be given to estimating vapor intrusion risks under future conditions (commercial and residential).

Response: At this time it is anticipated that the land use is not likely to change from the current conditions. Additionally, since the potential for risk associated with vapor intrusion is based on the building construction as well as groundwater concentrations, it is difficult to model the future potential vapor intrusion pathway and quantify risk in the event of a change in land use requiring construction as well as expected changes in VOC concentrations over time. Potential risks under a future land use scenario will be discussed qualitatively as part of the uncertainties discussion incorporated into the HHRA. Until concentrations of constituents in site media posing unacceptable risk are at levels allowing for unlimited use and unrestricted exposure, any change in land use will require a re-evaluation of potential risk to human receptors including vapor intrusion.

3. Page 50 of 57: This page appears twice in the work plan; please remove the duplicate page.

Response: The duplicate page will be removed from the PDF of the final work plan. The duplicate page in the hardcopy will need to be removed from each individual hardcopy.

Sincerely,



Adrienne Jones,
Project Manager

cc: Mr. Paul Herman/VDEQ
Mr. Scott Park/ NAVFAC Mid Atlantic
Tim Reisch/NAVFAC Mid Atlantic
Ms. Jamie Butler/ CH2M HILL