



DEPARTMENT OF THE NAVY
NAVY ENVIRONMENTAL HEALTH CENTER
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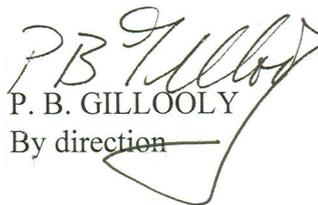
From: Commanding Officer, Navy Environmental Health Center
To: Commanding Officer, Atlantic Division, Naval Facilities Engineering Command
(Tim Reisch), 1510 Gilbert Street, Norfolk, VA 23511-2699

Subj: REVIEW OF DRAFT MASTER PROJECT PLAN, ST. JULIENS CREEK
ANNEX, CHESAPEAKE, VA

Ref: (a) LANTNAVFACENCOM ltr 5090 18225:TAR:swj of 26 Jul 99

Encl: (1) Subject Review
(2) Medical/Health Comments Survey

1. Per reference (a), we have completed a review of the subject document and forward our comments to you as enclosure (1).
2. Please complete and return enclosure (2) as your comments are needed to continually improve our services to you.
3. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. W. H. Etheridge at (757) 462-5549 or Mr. David McConaughy at (757) 462-5557. The DSN prefix is 253. The e-mail addresses are: etheridgew@nehc.med.navy.mil and mcconaughyd@nehc.med.navy.mil.


P. B. GILLOOLY
By direction

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NAVY ENVIRONMENTAL HEALTH CENTER ENVIRONMENTAL PROGRAMS DIRECTORATE

DRAFT MASTER PROJECT PLAN

Location: Chesapeake, VA

Command: St. Juliens Creek Annex

Site: Entire St. Juliens Creek Annex

Work Description: Draft Master Project Plan

Document Date: 26 July 1999

Contract No/Delivery Order No: N62470-95-D-6007g/0015

EP Document No: 4287

Prepared for: LANTNAVFACENGCOM

Prepared by: CDM Federal Programs Corporation

Forwarded on: 28 July 1999

Reviewed by:

W. H. Etheridge, (757) 462-5549, etheridgew@nehc.med.navy.mil, DSN 253

**MEDICAL REVIEW OF
DRAFT MASTER PROJECT PLAN
ST. JULIENS CREEK ANNEX
CHESAPEAKE, VIRGINIA**

Ref: (a) Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA (EPA/540/g-89/004), October 1988

General Comment: The document entitled "Draft Master Project Plan, St. Juliens Creek Annex, Chesapeake, Virginia dated May 1999, was provided to the Navy Environmental Health Center (NAENVIRHLTHCEN) for review on 28 July 1999. The report was prepared for the Atlantic Division, Naval Facilities Engineering Command by CDM Federal Programs Corporation. The Site-Specific Health and Safety Plan is addressed under separate cover.

Review Comments and Recommendations:

1. Table 4-5, "Summary of Potential Federal and State Water ARARs":

Comments:

- a. Table 4-5 contains a summary of federal and state citations, their applicability, and contractor comments on their specific impact to St. Juliens Creek Annex. The Safe Drinking Water Act applies to primary and secondary drinking water sources.

- b. We are concerned that all groundwater and surface water will be treated as a potential drinking water source. Under this assumption, the Navy may be asked to remediate water sources to drinking water standards that are not currently, or in the future, likely to be suitable for human consumption.

Recommendation: Specify under the column entitled "SJC Situation/Comment" that this applies only to present and potential future drinking water sources. This should be resolved with the regulators prior to sample collection and analysis.

2. Page 5-9, Section 5.5.1, "Baseline Human Health Risk Assessment":

Comments:

- a. This section discusses the components of the Risk Assessment for Superfund, RAGS A, Baseline Human Health Risk Assessment. We agree with the information presented. In addition to the information provided, we are endorsing the implementation of a three-tiered approach when conducting Human Health Risk Assessments. The tiered approach is in compliance with federal and state regulations, and satisfies the 9 NCP criteria for overall protection of human health and the environment.

b. Presently, the Navy is in the process of writing guidance for conducting human health risk assessments. The guidance will promote the use of the three-tiered approach. Also, on 5 April 99, the Chief of Naval Operations signed a policy memorandum 97-04, entitled, "Navy Policy for Conducting Ecological Risk Assessments." The policy stipulates using a tiered approach for conducting ecological risk assessments.

c. Section 5.5.1.4, "Risk Characterization" does not reference RAGS D which contains a standardized format for reporting risk assessment data and results. This required reporting format needs to be included in the Master Work Plan.

Recommendations:

a. We recommend conducting the human health risk assessment using the three-tiered approach. A three-tiered approach consist of the following:

- Tier IA, Preliminary Assessment, Risk Based Screen (RAGS B, D)
- Tier IB, Site Specific Risk Based Screen (RAGS B, D)
- Tier II, Baseline Human Health Risk Assessment (RAGS A, D)
- Tier III, Risk of Remedy (RAGS C, D)

b. Update the taskings as appropriate to incorporate the implementation of the tiered approach. Specifically, a task describing how to conduct a Tier IB, Site Specific Risk Screen, and a task describing the Tier III, Risk of Remedy, would need to be added to the text. Please call our office for additional details and assistance on conducting human health risk assessments using the three-tiered approach.

c. Include the reporting format of RAGS D in the risk characterization section of the work plan.

d. Add Section 6.5, "Risk of Remedy" to the work plan. This section should contain a brief discussion of the potential risk associated with remedial activity. Risk associated with remedial activity should be compared to the risk associated with present and future land use when making final risk management decisions.