

N69118.AR.001105
ST JULIENS CREEK
5090.3a

EMAIL AND COMMENTS FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
REGARDING APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS FOR
SITE 2 RECORD OF DECISION ST JULIENS CREEK ANNEX CHESAPEAKE VA
05/12/2010
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

From: Doran, Karen (DEQ) [Karen.Doran@deq.virginia.gov]
Sent: Wednesday, May 12, 2010 1:25 PM
To: Jones, Adrienne/VBO; Bob Stroud; Staszak, Janna/VBO; Walter Bell
Cc: Hollis, Michelle (DEQ)
Subject: Site 2 ROD - VDEQ comments
Attachments: image001.jpg

Team -

The referenced document has been reviewed by VDEQ. The ARARs comments provided below supersede comments on the Site 2 PP and FS previously submitted in March 2010. Please see below for ARARs coordinator and RPM comments:

ARARs comments:

Table A-2, Virginia Chemical- Specific ARARs

1. *Water Quality Standards*: 9 VAC 25-260-20 and 30. Add the following sections 50, 140, 185, 280, 310, and 410.
2. *Groundwater Quality Standards*: 9 VAC 25-280-30. Add the following sections 20, and 50 to 70.
3. In Virginia, both MCLs and SMCLs are contained in the Department of Health's *Waterworks Regulations*: 12 VAC 5-590-10 to 1280. The statutory basis for the *Waterworks Regulations* is found in Chapter 6 of Title 32.1 of the Virginia Code, *Environmental Health Services*: Va. Code Ann. §§ 32.1-163 to 248.2. In the absence of MCLs/SMCLs, other health-based standards or criteria, or best professional judgment based on risk assessment, may be employed. Where groundwater that is a potential drinking water source discharges to surface water, the cleanup level at the discharge point would be the more stringent of either the MCL/SMCL or a discharge limit based on the *Water Quality Standards*: 9 VAC 25-260-5 to 550. Please add *Waterworks Regulations*: 12 VAC 5-590-10, 370, 380, 390, 410, 420, 440, and 530.
4. Please add *Ambient Air Quality Standards*: 9 VAC 5-30-10 to 80.
5. Please add *Pollutant Discharge Elimination System (VPDES) Permit Regulation*: 9 VAC 25-31-10 to 940.

Table A-3, Federal Location- Specific ARARs

6. Correct the grammar or spelling for "meeting" located under the header comment for Wetlands.

Table A-4, Virginia Location- Specific ARARs

7. Please add *Definitions and Miscellaneous in General*: 4 VAC 15-20-130 to 140.
8. Please add *Rules and Regulations for the Enforcement of the Endangered Plant and Insect Species Act*: 2 VAC 5-320-10.
9. Please add *Chesapeake Bay Preservation Area Designation and Management Regulation*: 9 VAC 10-20-10 to 260.
10. Please add *Water Quality Management Planning Regulation*: 9 VAC 25-720-10 to 40, and 60.

Table A-5, Federal Action -Specific ARARs

11. Correct the spelling for “greater” located under the header prerequisite for PCB management.

Table A-6, Virginia Action -Specific ARARs

12. *Standards of Performance for Visible Emissions and Fugitive Dust/Emissions (Rule 5-1)*: 9 VAC 5-50-90 add the following sections 20 to 60, 80, 90, and 240 to 370.
13. Add the following sections 390, and 1182 to 1188 to the *Virginia Stormwater Management Program (VSMP) Permit Regulations*: 4 VAC 50-60-30 to 80, 300, 310, 380, 420, 430, 1100 to 1140, 1160, 1170.
14. *Solid Waste Management Regulations*: 9 VAC 20-80-140, 150, 240.(c). Add the following sections 60, 120, 210, 220, 230, 300, 310, 320, 470, 650, and 700.
15. Correct the citation contained on Table A-6 for the Air Pollution Control Board to VA Code Ann §10.1-1300 to 1328.
16. *Hazardous Waste Regulations*: 9 VAC 20-60-261 and 262. Add the following section 490.
17. Please add *Regulations Governing the Transportation of Hazardous Materials*: 9 VAC 20-110-10 to 130.
18. Please add *Private Well Regulations*: 12 VAC 5-630-360 to 480.

RPM comments

1. Section 1.3 - please include waste in this section
2. Section 1.4, first bullet - add “inlet” before “sediment”
3. Section 1.4, third bullet - change second “within” to “of”
4. Figure 2 - define black line in legend, clarify if the UST is really long and rectangular
5. Table 1 - rectify the date discrepancy of the Site 2 RI
6. Section 2.3, second paragraph - public meeting date should be May 18, 2010
7. Section 2.4 - we should include a statement indicating that the Site 21 and Site 2 GW plumes are not comingled
8. Section 2.5, second sentence - remove “Most of”
9. Figure 3 - include updated figure to include corrections made in the Site 2 PP
10. Figure 4 -
 - a. sample locations 17SS03 and 17SS04 as discussed in Section 2.5.1 (Waste and Soil) cannot be located on this figure
 - b. the purple line (VOC impacted area) extends outside of the red line (site boundary), please correct
 - c. add the St. Juliens Creek sediment area to this figure
 - d. the additional delineation sample in St. Juliens Creek and the additional waste delineation plans should be added to this figure
 - e. SB204 should be included within the DNAPL area and we should ensure that area is included in the high concentration area to be treated
 - f. individual sample locations are difficult to see, please include another figure that is zoomed in to the site boundary
11. Section 2.5.1, Waste and Soil - discuss the additional waste delineation in this section
12. Section 2.5.1, Sediment, second paragraph - discuss the additional St. Juliens Creek sediment sampling event in this section

13. Section 2.5.2, fourth bullet - please explain why specific contaminants are not included in this bullet as they are included in others
14. Section 2.5.2 - include transport of contaminated sediment into St. Juliens Creek
15. Section 2.7.1, Deep groundwater, last paragraph - please include updated language found in the Site 2 PP
16. Table 3, Terrestrial Receptors - please describe how the Screening Toxicity Values for aluminum and iron were formulated
17. Table 4 -
 - a. note * - remove comma after "indicating"
 - b. note 2 - remove semi-colon at end of note
18. Section 2.9.1, Contingency Remedy Component - when will the details of the contingency remedy be document?
19. Table 7 - 30 year timeframe is not realistic for any alternative except 7 & 8, it underestimates cost for O & M
20. Section 2.9.2, Compliance with ARARs, first sentence - change "regulations" to "requirements"
21. Section 2.9.2, Cost, third sentence - change "costs beyond 30 years has" to "costs beyond 30 years have"
22. Section 2.11.2, ERD within High Concentration Target Area, third paragraph -
 - a. first sentence is confusing, please reword
 - b. last sentence - the need for additional action should be evaluated annually
23. Section 2.11.2, MNA, first paragraph, last sentence - move "and" behind "volume"
24. Section 2.11.3 - is the PRB expected to break TCE down to ethene?
25. Section 2.11.3, last sentence - the need for additional action should be evaluated annually
26. Table 9 -
 - a. include periods in all boxes or remove them all for consistency
 - b. shallow GW, HH Risk - why is vinyl chloride listed for inhalation and other VOCs aren't?
 - c. shallow GW & surface water, remedy component - add "and performance monitoring" to "ERD"
 - d. shallow GW, metric (ERD) - define NAC the first time it's used
 - e. shallow GW & surface water, remedy component - add "and LUCs" to "Soil Cover"
27. Section 3, last sentence - change "Proposed Plan" to "ROD"
28. Acronyms and Abbreviations, ARAR - change "regulation" to "requirement"
29. References -
 - a. #5 - it isn't clear where the reader can find this information, please include more specific information, i.e. page numbers
 - b. #15 - this information can also be found in Tables 3-1 and 3-6, please add
 - c. #22 - please include section number

Thank you for the opportunity to comment.

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