Response to Comments
Draft Remedial Investigation Addendum Report for Site 21
St. Juliens Creek Annex
Chesapeake, Virginia

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VDEQ provided comments on the Draft Remedial Investigation Addendum Report for Site 21 on May 3 and May 6, 2010. Responses to the comments were provided on July 27, 2010 and discussed during the July 2010 partnering team meeting, during which VDEQ requested additional information concerning the Building 1556 elevator. Therefore, based on additional information obtained on the elevator, as discussed during a conference call on August 13, 2010, attended by the Navy, VDEQ, and CH2M HILL, the response to the comment has been revised, as follows.

RPM Technical Comment 2: Section 6.1 – is there an elevator sump that may be a preferential pathway?

Response: There is an elevator and associated pit located in the southern portion of Building 1556 that connects the first and second stories of the building. The closest available depth to groundwater data, which was collected in the monitoring well located within the building, averages 6.8 feet below the slab; this is below the elevator pit, for which a building drawing (EFD Drawing No. 324374, June 5, 1992) indicates a pit depth of 4 feet and identifies a waterproof layer on all sides of the pit. The highest groundwater COC concentration in close proximity to the elevator, cis-1,2-DCE at 9 µg/L, was detected at temporary monitoring well location TW103. According to information provided to Walt Bell by Bill Landon, the head of Inspections and Certifications at NAVFAC MIDLANT, during a conversation on August 13, 2010, groundwater infiltration has not been observed during any of the elevator inspections, and Mr. Landon believes the building construction includes a vapor barrier that consists of 6 to 12 inches of gravel fill overlain by 50 mil polyethylene sheeting and a sheet of polyvinyl chloride.

Therefore, based on the deeper water table, low COC groundwater concentrations in the area, inspection results, and the construction details, the elevator pit is not believed to be a significant preferential pathway. The following sentence has been added as the sixth sentence of the first paragraph of Section 6.1, "According to Bill Landon of NAVFAC Mid-Atlantic, the building construction likely includes a vapor barrier that consists of 6 to 12 inches of gravel fill overlain by 50 mil polyethylene sheeting and a sheet of polyvinyl chloride (Landon, 2010)."

The following sentences have been added as the ninth and tenth sentences of the first paragraph of Section 6.1, "An elevator, including a subslab pit and shaft, connecting the first and second stories is located on the south end of the building. However, it is not believed to present a significant preferential pathway for vapor intrusion because a NAVFAC drawing (EFD Drawing No. 324374, June 5, 1992) indicates that a waterproof layer is present on all sides of the pit, COC concentrations are low in the area, and, according to Bill Landon based on a discussion with the Building 1556 elevator inspector, groundwater has not been observed in the pit during any of the regularly conducted elevator inspections (Landon, 2010)." Inclusion of this area in future vapor intrusion related activities will be considered during development of the monitoring plan.