

N69118.AR.001046  
ST JULIENS CREEK  
5090.3a

**Staszak, Janna/VBO**

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**From:** Burchette.John@epamail.epa.gov  
**Sent:** Thursday, January 08, 2009 8:40 AM  
**To:** walt.j.bell@navy.mil; Staszak, Janna/VBO; jlcutler@deq.virginia.gov; kmdoran@deq.virginia.gov  
**Subject:** EPA Comments on Site 21 UFP SAP Worksheets 10 and 11  
**Attachments:** Comments on Worksheets 10 and 11 (1-7-09).doc

Attached are EPA comments on worksheets 10 and 11. Thank you for the opportunity to comment on this document.

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**EPA Comments**  
**UFP SAP Worksheets 10 and 11**  
**St. Juliens Creek Annex**  
**Chesapeake, Virginia**

EPA RPM Comment 1: Page 25, Building Evaluation. There are a number of instances where is used when describing the size of the buildings. Please adjust these to be consistent with one another (currently (), ft2, and ).

EPA RPM Comment 2: General Problems to Address. Final sentence on the page. Worksheet 10 states that, “The other building will not be evaluated unless the current land use changes”. This needs to be done in some type formal documentation. Documentation of these restrictions should be placed in a LUC’s document, deed restriction/notice, and updated on the base master plan.

EPA RPM Comment 3: Page 26, Final Paragraph. The sentence of the final paragraph states, “Collection of indoor air samples will provide a direct measurement of exposure point concentration to quantify potential risks in the building if necessary”. Please remove potential.

EPA RPM Comment 4: Page 28, What will the data be used for?” Sentence. Please remove potential.

EPA RPM Comment 5: Page 29 paragraph. The worksheet states, “The results of the initial sampling event will determine the total number of sampling events. A minimum of one and a maximum of four sampling events will be conducted.” However, there does not appear to be a scenario where only one round of samples are taken. Please revise this sentence and maybe include the word subsequent or additional.

EPA Toxicologist Comment 1: All of the PAL values are appropriate with the exception of the following:

trans-1,2-DCE

1,1-DCE

Freon 12

Since these contaminants are all non-carcinogens, the screening value must be adjusted to 0.1. thus, the appropriate screening values are as follows:

trans-1,2-DCE - industrial indoor air-26 ug/m<sup>3</sup>; residential indoor air-6.3 ug/m<sup>3</sup>,  
industrial sub slab-260 ug/m<sup>3</sup>, residential sub-slab-63 ug/m<sup>3</sup>

1,1-DCE - industrial indoor air-88 ug/m<sup>3</sup>; residential indoor air-21 ug/m<sup>3</sup>, industrial sub  
slab-880 ug/m<sup>3</sup>, residential sub-slab-210 ug/m<sup>3</sup>

Freon 12 - industrial indoor air-88 ug/m<sup>3</sup>; residential indoor air-21 ug/m<sup>3</sup>, industrial sub  
slab-880 ug/m<sup>3</sup>, residential sub-slab-210 ug/m<sup>3</sup>