Revised
Responses to Comments
Draft Preliminary Assessment Report
UXO 0001 – Wharf Area Sediments
St. Juliens Creek Annex
Chesapeake, Virginia

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DATE: June 15, 2009 (Revision to May 8, 2009 submittal)

Comments from EPA, provided 30 March 09.

1. ***Comment:*** *General Comment* - EPA generally agrees with the conclusion of the Preliminary Assessment. However, please keep in mind that munitions that were originally loaded from the Southern Wharf Area may have been dropped into the Elizabeth River and drifted to what was known as the "dolphin wharf area". EPA suggests that if evidence presents itself during the Site Inspection that would suggest munitions may be present in the dolphin wharf area (e.g. munitions trail or MC seeming to be coming from that area), then further investigation of the dolphin wharf area would be recommended.

   Response: Comment noted. Future investigations will be conducted to delineate the nature and extent of MEC and MC, if present. The site boundaries will be revised (expanded or reduced) based on the findings of the investigations. The investigation approach will be developed by the team in the Site Inspection work plan and will initially focus on areas most likely to contain MEC/MC (the Northern and Southern Wharf Areas where loading of munitions occurred). No revision was made to the PA based upon this comment.

2. ***Comment:*** *Section 2.2.2 Historical Activities, second to last sentence.* Please remove the double period.

   Response: The double period from the second to last sentence of Section 2.2.2 has been deleted.

3. ***Comment:*** *Section 3.2.1 Site Screening Assessment, 2nd Paragraph.* The IAS recommended that Real estate records be annotated to indicate ordinance may be present, however this has not been done. Please explain why this recommendation was not followed.

Response: The reasoning for why real estate records were not annotated as suggested by the IAS is unknown. The potential presence of ordnance in the area was not noted in the real estate records reviewed during the PA. No revision was made to the PA based upon this comment. However, a note has been added to internet Navy Facility Assets Data Store (iNFDAS) under the St. Juliens Creek Annex Wharf Property Record Cards stating: "Unexploded ordnance may exist along all of the St. Juliens Creek Annex Wharfs." Additionally, the area is identified in the Environmental Restoration Plan GIS, which identifies areas of concern, is used during operational planning and decision-making at the facility, and is updated annually or when conditions change. Requirements for land use controls and/or future actions at the site will be reevaluated during the SI and as new information becomes available.

4. ***Comment:*** *Section 3.2.2, Wharf History 2nd paragraph on page 3-10.* The PA states, "Upon completion of the wharf extension in 1944, it was projected that approximated…" please revise.

   Response: This sentence has been revised as follows, "Upon completion of the wharf extension in 1944, it was projected that approximately…"

5. ***Comment:*** *Section 4.1.2 Physical Profile, last sentence.* See Comment 3.

   Response: See Response 3. No revision was made to the PA based upon this comment.

6. ***Comment:*** *Section 4.1.3 Release Profile.* EPA suggests that 1,3 Dinitrobenzene be included in the list of MC that may be present. This compound was already detected at IRP Site 20. Additionally, EPA generally suggests analyses include TAL, TCL, Explosives 8330 and EPA 609 for TNT. However, the PA states that "Any type of conventional ordnance that was in the U.S. inventory during that period may have been shipped to and from SJCA". This opens the door for all MC produced during that era to be analyzed for. St. Juliens Creek Annex has also been documented as having stored 281 CAIS test kits in the past in Building 163. These test kits included mustard compounds etc… Please include the compounds that typically would be found in these test kits on the list of compounds that may be present (since it is documented they were on site), or provide justification of why EPA would not concerned with such compounds. Further, EPA suggests that an agreed upon sampling strategy (work plan) is agreed upon by the partnering team prior to the collection of MC samples.

   Response: 1,3 Dinitrobenzene has been added to the list of potential MC that may be present at the site. The comment regarding analyses is noted. No changes to the text have been made; the sampling approach will be developed by the team following the UFP SAP process. CAIS have been added to the document as potential items that may have been shipped from the wharf areas. The MRSPP worksheets addressing CWM (including Table 11) have been revised to reflect this change. Additionally, the Section 4.1.3 text has been revised to include CAIS and shipping containers as potential items and to include a list of potential chemical agents, which may be part of CAIS. CAIS were typically a number of

vials which were packaged into metal canisters (coffee or paint can style) which were then placed into either a larger metal container called a Package In-transit Gas (PIG) container, or a wooden box. Therefore, the recommended action of an SI with magnetic investigation still applies. Additional monitoring and testing requirements may be included in future phases of work if evidence of CAIS is identified during the SI. Finally, all future work plans will be developed and reviewed in accordance with the standard partnering procedures.

Comments from VDEQ, provided 15 April, 2009.

1. ***Comment:*** *Section 3.1.1, Last Paragraph.* Please replace "Intercoastal" with "Intracoastal."

   Response: The suggested revision has been made.

2. ***Comment:*** *Section 3.2.1 and Section 3.2.2, last paragraph.* Please replace "lose configuration" with "loose configuration".

   Response: The suggested revision has been made.

3. ***Comment:*** *Section 3.2.2, Sonar Imagery – Last sentence.* Please word to say "bottom <u>of</u> river."

   Response: The suggested revision has been made.

4. ***Comment:*** *Figure 4-1.* The colors in the legend do not match the colors in the figure, please correct.

   Response: Revisions have been made to Figure 4-1 to correct the legend.