

EPA Comments
MRP Area UXO 0001 Preliminary Assessment Report
St. Juliens Creek
Chesapeake, VA

EPA RPM 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.

EPA RPM Comment 1: Section 2.2.2 Historical Activities
Second to last sentence. Please remove the double period.

EPA RPM Comment 2: Section 3.2.1 Site Screening Assessment. 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.

EPA RPM Comment 3: Section 3.2.2, Wharf History paragraph on page 3-10.
The PA states, “Upon completion of the wharf extension in 1944, it was projected that approximated...” please revise.

EPA RPM Comment 4: Section 4.1.2 Physical Profile. Last sentence. See comment 2.

EPA RPM Comment 5: 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 be 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.