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Mr. Jeffrey Boylan  
NPL/BRAC  
Federal Facilities Branch (3HS11)  
U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Subject: Response to Comments, *Draft Site Management Plan Fiscal Years 2010 through 2014*,  
Naval Amphibious Base Little Creek, Virginia Beach, Virginia

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received via .pdf mark-up from USEPA on the *Draft Site Management Plan Fiscal Years 2010 through 2014* at Naval Amphibious Base Little Creek, Virginia Beach, Virginia:

**Comments:**

1. Section 2.3: Please clarify these other assessments. Are the six bulleted multiple site documents listed in the next paragraph?

**Response:** The RVS and RFA were included in the list of bullets such that the bulleted documents directly correspond with the subsections that immediately follow the list.

2. Section 2.4: What is the importance of this sentence? "The schedules derived from these guidelines assume informal dispute resolution."

**Response:** This sentence refers to the FFA's guidance on timeliness for informal dispute resolution. Informal disputes are qualitatively different than formal written disputes according to Section XX of the FFA. Formal disputes escalated to the DRC will follow the schedule described in the FFA and may subsequently impact the site schedules described in the SMP document.

3. Section 2.4: Are these sites RC? Sites 9, 10 and 12 have or will have IRACRs? What about Site 8, SWMU 7a and SWMU 8?

**Response:** To clarify site categories, the text was revised to state the following, "RODs requiring action are currently in place for Sites 7 and 13. RODs with remedy in place (RIP) include Sites 9, 10, 11 and 12. These sites are depicted on **Figure 2-1**. Response is complete for Site 8, SWMU 7a, and SWMU 8. These sites are depicted on **Figure 2-2** since no further action is required."

4. Section 2.4.1: Insert additional bullet (1st) - "Vapor Intrusion Work Plan".

**Response:** The text was revised accordingly.

5. Section 2.4.1: Would the next task be RA Work Plan for the LUC RD? See comment for Table 2-10.

**Response:** The text was revised to include the bullets, "LUC RD", "RA Work Plan", and "RA"

6. Section 2.4.2: Flip these two bullets, see table 2-11. Add new bullet at end - "LTM" and in table 2-11

**Response:** The text was revised accordingly.

7. Section 2.4.2: What is meant by this? Is this referring the performance monitoring phase of the RA? Should be "RA Performance Monitoring".

**Response:** The text was revised to state "RA Performance Monitoring".

8. Section 2.4.2: Add bullet at end - "LTM"

**Response:** The text was revised accordingly.

9. Section 2.4.3: Since Sites 9, 10 and 12 have or will have IRACRs, can the site be considered RC versus say RIP? EPA suggest adding a Remedy in Place Section.

**Response:** A Remedy in Place Section was included in the SMP for sites that have signed RODs and the selected remedy has been implemented; however, action is still required. Sites in this section include Sites 9, 10, 11, and 12.

10. Section 2.4.3: What is this statement meant to convey?

**Response:** The boundary of the Site 9 landfill was not precisely delineated prior to 2000. Following a soil cover survey in 2000, the vertical and horizontal extent of waste was delineated at Site 9. This statement referred to site knowledge prior to the soil cover survey. To clarify, Paragraph 9 was revised to state the following, "Although precise boundaries for the fill area were not delineated, the boundary of the landfill was considered to generally coincide with that of the driving range (Ebasco, 1991a)." To provide a more complete site history, Paragraph 11 was revised to state, "To estimate the horizontal extent of the waste and to determine if there was adequate soil cover, a soil cover survey was conducted at Sites 9 and 10 by CH2M HILL in February 2000. Results confirmed the boundary of the landfills and demonstrated the majority of the landfills contain 2 or more feet of soil cover."

11. Section 2.4.3: Based upon? There also is no mention of the boundaries of the landfill (See Site 9 above) for Site 10; how they were determined, etc.

**Response:** In regards to the boundary of the landfill for Site 10, the aforementioned revisions made to Paragraph 11 adequately provide a more complete site history. In regards to the statement referring to the contents of the Site 10 landfill, the text revised to state, "The IAS indicated that potentially hazardous constituents and a large quantity of demolition debris were likely disposed of in the landfill; however the exact quantities of material disposed in the landfill are not documented."

12. Section 2.4.3: Was this document issued?

**Response:** A RACR was not issued for Sites 9 and 10, but an IRACR was issued in 2005. To clarify, the text was revised to state the following, "An LUC RD was completed in March 2004 (CH2M HILL, 2004d) to implement the remedial action objectives (RAOs) outline in the ROD and was followed by an IRACR issued in February 2005 and signed in April 2005 to document completion of the RA and to document the remedy is in place, operational, and functional in accordance with CERCLA (CH2M HILL, 2005c, 2005g).

13. Section 2.4.3: Add bullet at the end – "LTM".

**Response:** Text was revised as requested

14. Section 2.4.3: Thought this was the LUC RD. The ROD describes how the implementation, etc., will occur.

**Response:** In accordance with language in the LUC RD, the text was revised to state the following, "LUCs are part of the remedy and will be implemented, maintained, monitored, enforced, and reported on in accordance with the ROD and sections 3.0 and 4.0 of the LUC RD."

15. Section 2.4.3: Add bullet to the end – “LTM”.

**Response:** Text was revised as requested.

16. Table 2-4: Where is this figure? Should it be table 2-6?

**Response:** The flow chart should reference Table 2-6. The text was revised accordingly.

17. Table 2-10: Shouldn't the next task be RA Work Plan?

**Response:** Table 2-10 has been revised to include tasks associated with the RA Work Plan.

18. Table 2-11: Add LTM as a task. See table 2-12 and 2-13.

**Response:** Table 2-11 has been revised to include tasks associated with LTM.

19. Table 2-14: Add Site 10 to Task Name and add "LTM" task.

**Response:** Table 2-14 has been revised to include Site 10 in the Task Names and tasks associated with LTM have been included.

If you have any questions concerning these comments, please give me a call at (757) 671-6213.

Sincerely,



Adina Carver,  
Project Manager

cc: Mr. Paul Herman/VDEQ  
Mr. Tim Reisch/NAVFAC Mid Atlantic  
Ms. Jamie Butler/CH2M HILL  
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