

12/13/06 - 01295

December 13, 2006

Mr. Scott Park
NAVFAC Mid-Lant
9742 Maryland Ave
Code EV 3, Bldg N-26, Rm 3208
Norfolk, Virginia 23511-3095

Subject: Naval Amphibious Base Little Creek
Draft Master Project Plan Volumes I and II

Dear Mr. Park:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft Master Project Plan Volumes I and II* dated October 2006. Based on the VDEQ review we offer the following comments:

Volume I

1. Signature page: Please include a signature line for EPA.
2. Section 2.2.1: The 2nd paragraph states Little Creek Reservoir/Lake Smith are located north of the base. The Chesapeake Bay is north of the base. Please correct.
3. Section 2.2.4: Please indicate the direction of groundwater flow in this section using a statement similar to, "Flow in the Columbia aquifer is expected to be controlled by nearby surface water features while the flow in the Upper Yorktown aquifer may be more northerly toward the Bay."
4. Section 2.3: Please rewrite the 2nd to last sentence of the last paragraph as follows, "Upon VDEQ concurrence with the selected remedy for the site, the Navy and EPA jointly sign and issue the ROD."
5. Section 2.3.1: Refrain from specifying the SMP in the last sentence of the opening paragraph as the document is updated annually which may make this statement obsolete next year. Rather, replace the year-specific reference with "the annually updated SMP."
6. Section 2.4.4: Please include a subsection for "Site Investigations" as they are referenced in the opening paragraph. To the end of the opening sentence of the "Remedial Investigation" subsection please add "sediment and surface water".
7. Section 3.2.11: When conducting surveys for tidal wetland mitigation/replacement/reestablishment, the local wetland mitigation governing body should be consulted concerning the proper datum to be used. Typically, wetland designers use the Nation Ocean Survey (NOS) tidal datum rather than the National Geodetic Vertical Datum.
8. General Comment: The term "Navy/regulators" is used a number of times in the document. Please replace "regulators" with "EPA and VDEQ" or define "regulators" as an abbreviation or in a glossary.
9. Section 3.2.12, Liquid IDW, Step 3: Please replace the language in this Step with a copy of the 2nd paragraph of this subsection.

10. Section 3.2.13: Please specify heavy equipment includes backhoes, dump trucks, graders, etc.
11. Appendix B, Table B-1: Please provide the meaning of the asterisk used in the table.
12. Appendix C, Tables C-2 and C-4: Please add the Virginia Water Quality Management Planning Regulation (9 VAC 25-720) as it is a location-specific and chemical-specific ARAR.

Volume II

13. SOPs – Decontamination, IV.F.: The section specifies decontamination upon arrival. Please add “prior to departure from the site the heavy equipment will be decontaminated to ensure contaminants are not transported off site.”
14. SOPs – Ecology, VI: Attachment I could not be located. Please correct.
15. SOPs – Geophysical, V.A.: No figures were provided. Please correct.
16. SOPs – Hydrogeology, III.B.: Is the Upper Patapsco Unit an appropriate hydrogeologic feature for Tidewater Virginia? Please explain. Also, please define Talbot. It appears to be a specific type of piezometer but that does not become clear until after the term is used.
17. SOPs – Other – Streamflow Measurements: There are 2 B’s under part III and no figures provided. Please correct. For Part B. Taking Measurements, the gradations on the “special rod” mentioned in the opening paragraph are not in centimeters but in tenths of a foot. Headphones are typically connected to the wading rod which connects to the meter and each rotation of the cups generates a click in the headphones that is counted by the operator. In the 3rd paragraph please note the tape or marked cable is set perpendicular to the direction of flow. When pointing the meter upstream, the cups should point upstream and the fins downstream.

If you have any questions concerning this comment, please give me a call at (804) 698-4464.

Sincerely,

Paul E. Herman, P.E.
Remediation Project Manager

cc: NABLC Tier 1 (electronic copy)
NABLC Correspondence File
Milt Johnston, VDEQ-TRO