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U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
COMMENTS ON DRAFT ENGINEERING EVALUATION/COST ANALYSIS FOR SOLID  
WASTE MANAGEMENT UNIT 7B (SWMU7B) SMALL BOATS SANDBLAST YARD JEB LITTLE  
CREEK VA  
11/21/2012  
CH2MHILL



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November 21, 2012

Virginia Department of Environmental Quality  
Attn: Mr. Paul Herman, P.E.  
629 Main Street, 4th Floor  
Richmond, VA 23219

Subject: Response to VDEQ Comments on the  
*Draft Engineering Evaluation/Cost Analysis for Solid Waste Management Unit 7b - Small Boats Sandblast Yard*  
Joint Expeditionary Base Little Creek, Virginia Beach, Virginia  
Navy CLEAN 1000, Contract N62470-08-D-1000, Task Order WE32

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments from VDEQ received on October 17, 2012 on the *Draft Engineering Evaluation/Cost Analysis for Solid Waste Management Unit 7b - Small Boats Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, September 2012):

**Comment 1:** Section 1.0: The last sentence of the 3<sup>rd</sup> paragraph notes "potential ecological risks in sediment were further evaluated". Please include some discussion of human health risk as well.

**Response:** The text has been revised to include discussion regarding human health risk evaluation.

**Comment 2:** Section 2.2: In the 2<sup>nd</sup> paragraph please note whether or not the outfalls discussed in the 2<sup>nd</sup> sentence are permitted. At the end of the 2<sup>nd</sup> paragraph please specify the land use at SWMU 7.

**Response:** The 2<sup>nd</sup> sentence of the 2<sup>nd</sup> paragraph was revised to read: "Precipitation runs off to Desert Cove or is discharged through one of 22 outfalls (11 non-regulated stormwater, 8 regulated stormwater, and 3 regulated process water) surrounding the cove with very little infiltration to groundwater." Additionally, Figure 2-2 was revised to identify the regulated stormwater and process water outfalls. The following sentence was added to the 2<sup>nd</sup> paragraph, "SWMU 7 is actively used by the facility for heavy equipment storage, small ship mooring, ship maintenance (i.e., sandblasting in Building CB-125), and training."

**Comment 3:** Section 2.3.1: The 1<sup>st</sup> paragraph states "numerous outfalls" surround the cove while the 2<sup>nd</sup> paragraph specifies there are "19 stormwater outfalls". If only stormwater outfalls discharge to the cove please replace "numerous" with "19". If there are non-stormwater

outfalls discharging to the cove please identify how many such outfalls discharge to the cove and note whether or not each is permitted.

**Response:** The 2<sup>nd</sup> sentence was revised to read: "Because of the tidal nature of the water body and 21 outfalls (19 stormwater and 3 process water) surrounding the cove, any contamination detected in the surface water of the cove may or may not be associated with SWMU 7; therefore, surface water was not evaluated in the HHRA and ERA." Additionally, per EPA comments received, the 1<sup>st</sup> sentence of the 2<sup>nd</sup> paragraph was revised to read: "The Tier I Partnering Team agreed that potentially unacceptable ecological risks associated with PAHs in sediment are likely primarily attributable to the 19 stormwater outfalls that convey stormwater runoff from various locations within the facility, including numerous parking areas, and not attributable to historic sandblasting activities at SWMU 7b. Therefore, PAHs do not require further investigation/action under CERCLA. "

**Comment 4:** Section 3.5: As stormwater discharges to Desert Cove may be authorized by a VPDES permit, please revise the end of the opening sentence as follows, "with applicable laws, regulations, and permits."

**Response:** Per changes to the procedures for returning decant water to Desert Cove discharge through a VPDES permitted outfall will not be conducted, therefore inclusion of "permits" within the referenced sentence is not required.

**Comment 5:** Section 4.1.1: Please delete the 2<sup>nd</sup> sentence as this action may not represent the final action for the site. At some point in the future a formal ROD will be prepared which will define any 5 year review requirements.

**Response:** The 2<sup>nd</sup> sentence has been deleted.

**Comment 6:** Sections 4.1.2, 4.1.3, and 4.1.4, Dewatering and Solidification: The teen pier MILCON dredge will be performed under the Department of the Army Norfolk District, Corps of Engineers (Corps) Regional Permit 19 (08-RP-19), Activity #3 as well as the Special Conditions outlined by the Corps in their letter Mr. W. David Noble, Commander Navy Region Mid-Atlantic dated October 20, 2011 and the Navy permit application (NAO-2010-2117NMRC#11-V0836). Because VDEQ provided § 401 Certification of 08-RP-19, a separate Virginia Water Protection (VWP) Permit was not required for the MILCON dredge provided the Navy complies with the conditions of the Corps permit. Therefore, all CERCLA dredging activities conducted under the umbrella of 08-RP-19 and associated special conditions must be performed in accordance with the specifications outlined in the permit. Any process not specifically addressed by the permit would be subject to the substantive requirements of any applicable local, state or federal law or regulation. For example, Alternatives 3 and 4 include on-site solidification of the sediment, a process not covered under 08-RP-19, the Special Conditions, or the permit application which states this activity will be carried out at Port Weanack.

Therefore, the on-site solidification component of these alternatives may be required to comply with the substantive requirements of any applicable local, state or federal law or regulation. With regard to the dewatering component of each alternative, as the sediment is associated with a CERCLA release, the discharge of the supernate water must not violate Virginia Water Quality Standards (this is a requirement of 08-RP-19, Section VI - Special Condition for

Discharges # 1). Also note, on-site implies within SWMU 7 which may require the treatment and material staging systems constructed at SWMU 3 to be moved to SWMU 7. One more note, Section 4. 1.4, Dredging, should refer to Desert Cove rather than Little Creek Harbor.

**Response:** The SWMU 7b CERCLA action will not be conducted under the umbrella of the MILCON permit and therefore this permit is not an ARAR. Additionally, remedial actions are not included as an authorized activity of Norfolk Regional Permit 08-RP-19; therefore this permit is not an ARAR. The CERCLA action for SWMU 7b will be conducted while meeting the intent of Nationwide Permit 38.

The MILCON subcontractor will be utilizing a water filtration system that will be located on the scow to decant the dredged sediment. The onsite temporary water treatment system currently referenced in the draft EE/CA will not be utilized for Alternatives 2 and 3. The text for Alternatives 2 and 3 has been updated to reflect these changes. Because sediment will be mixed with a polymer to enhance dewatering, weep water generated as a part of Alternative 4 will pass through a temporary onsite wastewater treatment system prior to point source discharge to Desert Cove. The text for Alternative 4 has been updated accordingly.

As noted in response to comment 7, the VWQS have been added as an applicable ARAR for Alternatives 2, 3, and 4.

The sentence has been revised to refer to dredging Desert Cove rather than Little Creek Harbor.

**Comment 7:** Appendix B, Table B-6: Please add *Virginia Water Quality Standards: 9 VAC 25-260-140* as an Applicable ARAR for alternatives 2, 3 and 4. These alternatives propose treatment and discharge of water from sediment dewatering activities. The proposed discharge to state waters must comply with 08-RP-19 Special Condition for Discharges #1 and not violate Virginia Water Quality Standards.

**Response:** See response to comment 6 with regards to treatment and discharge of decant water. The Virginia Water Quality Standards, as they pertain to the SWMU 7b sediment COCs with applicable values, has been added to the chemical-specific ARARs table. No effluent monitoring will be conducted during dredging and dewatering. Decant water will be filtered to remove solids and monitoring for visual changes in turbidity and sheen will be conducted. A turbidity curtain and oil boom will be employed during all dredging and sand placement activities, with additional protection surrounding the discharge point.

Please add *Virginia Pollutant Discharge Elimination System (VPDES) Permit Regulation: 9 VAC 25-31-190 D, E, J(1), J(3), 1(4), and 200(A)(2)(a) and (A)(2)(b)* as an Applicable ARAR for Alternatives 2, 3 and 4. These alternatives propose a discharge of water from temporary water treatment activities would meet VPDES requirements.

**Response:** Per changes made to the alternatives 2 and 3, decant water will be filtered on the scow and directly discharged to Desert Cove; therefore this requirement is neither applicable nor relevant and appropriate for those alternatives. However, alternative 4 involves a point source discharge from a treatment system. The requirements were added as an applicable action-specific ARAR for alternative 4 with the following revised citations: 9 VAC 25-31-190D, E, J(1), J(3), J(4); 200(A)(2)(a)

and (A)(2)(b). Sections 190(A) and (J)(2) are administrative. Section 190(L)(6) addresses an issue that is not onsite. Since ARARs address onsite actions only, it was not added to the table. Sections 200(A)(2)(c) and (A)(2)(d) refer to the content of a permit application and administrative review; therefore they were not added to the table.

Please add *Virginia Erosion and Sediment Control Regulation: 4 V AC 50-30-40 (2), (12), (14), (15), (16 c.) and (19 k.)* as a Relevant and Appropriate ARAR for alternatives 2, 3 and 4. These alternatives propose removing sediment from a waterway and involve working on land adjacent to a waterway.

**Response:** The requested ARAR was added as relevant and appropriate.

**Comment 8:** Appendix C, in each table please define the "Unit" acronym "LS" in the "Notes".

**Response:** The "Unit" acronyms have been replaced with the complete term (i.e. "LS" has been changed to "Lump Sum").

The above response (and other Team comments/responses) will be incorporated into the draft final version of the SWMU 7b EE/CA to be submitted for public comment.

Please do not hesitate to contact me at 757-671-6280 if you have any questions concerning these responses.

Sincerely,



Nathaniel Price, P.E.  
Project Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic  
Mr. Jeffrey Boylan/USEPA  
Ms. Cecilia Landin/CH2M HILL  
Administrative Record File