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LETTER AND U S NAVY RESPONSE TO U S EPA REGION II COMMENTS ON DRAFT  
ACTION MEMORANDUM FOR SOLID WASTE MANAGEMENT UNIT 7B (SWMU7B) SMALL  
BOATS SANDBLAST YARD JEB LITTLE CREEK VA

1/16/2013  
CH2MHILL



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January 16, 2013

USEPA Region 3  
NPL/BRAC Federal Facilities Branch (3HS11)  
Attn: Mr. Jeffrey Boylan  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Subject:** Response to USEPA Region 3 Comments on the  
*Draft Action Memorandum 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. Boylan:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments from USEPA received on January 15, 2013 on the *Draft Action Memorandum for Solid Waste Management Unit 7b Small Boats Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, December 2012):

**Comment 1:** Declaration Page: Please revise declaration headings "subject, from and to" consistent with SWMU 3 declaration.

**Response:** The declaration page headings have been revised to be consistent with the SWMU 3 declaration page headings.

**Comment 2:** Declaration Page: Please remove the acronyms "SWMU", "EE/CA", and "NCP".

**Response:** The following acronyms "EE/CA", "NCP", and "ROD" were removed from the declaration page. "SWMU" was not removed as it is used a numerous times within the declaration text.

**Comment 3:** Acronyms and Abbreviations: Please add "ROD", "NPL" and "NFA" to the list; delete "PAH"; and change "U.S." to "United States".

**Response:** The requested revisions have been made.

**Comment 4:** Section I: In the 1<sup>st</sup> paragraph please revise the sentence to clearly convey the anticipated path forward. The removal action will not be the "final remedy" for the site; the ROD is expected to be "no further action".

**Response:** The sentence was revised to state, "It is expected that the removal action will mitigate all risks at SWMU 7b and no further action will be required for the site,

to be documented in a forthcoming Proposed Plan and Record of Decision (ROD).” Additionally, the last sentence in the 1<sup>st</sup> paragraph of the Declaration was revised accordingly.

**Comment 5:** Section II: change “United States Environmental Protection Agency (USEPA)” to “USEPA”. The term was previously abbreviated in Section I.

**Response:** The requested revision has been made.

**Comment 6:** Section II.A: See SWMU 3 – Permit language is included in this paragraph.

**Response:** The 3<sup>rd</sup> sentence in the 2<sup>nd</sup> paragraph was revised to state, “Precipitation runs off to Desert Cove or is discharged through one of 22 outfalls surrounding the cove with very little infiltration to groundwater. Eight of the 22 outfalls are defined as regulated stormwater and three as regulated process water outfalls under the current Virginia Pollution Discharge Elimination System permit, VA0079928. The remaining 11 outfalls are non-regulated stormwater outfalls.”

**Comment 7:** Section II.A: Change “MILCON” to “Military Construction (MILCON)”

**Response:** The requested revision has been made.

**Comment 8:** Section II.A: add the following sentence to the end of the last paragraph, “Recreational swimming, fishing, and crabbing are not permitted in Desert Cove.”

**Response:** The requested sentence has been added.

**Comment 9:** Section II.A.1: change “indoor facility (CB-125)” to “indoor building CB-125” and insert “buildings” before “CB-317 and CB-318”

**Response:** The first sentence was revised to read: “SWMU 7 was used to sandblast and paint ships until 1996, when sandblasting activities were moved to an indoor sandblasting facility in building CB-125.” Additionally, the second sentence has been revised to state, “...building CB-125...” and “...buildings CB-317 and CB-318.”

**Comment 10:** Section II.A.1: Change “Record of Decision” to “ROD” and “human health risk assessment” to “Human Health Risk Assessment”.

**Response:** The requested revisions have been made.

**Comment 11:** Section II.A.1: For clarification, no surface water samples were ever taken as part of the investigation(s) for SWMU 7b?

**Response:** Correct, as documented in the final RI no surface water samples were collected for SWMU 7b since the source of contamination could not be determined due to the tidal nature of the water body and the presence of numerous outfalls surrounding the cove. No changes to the document were made.

**Comment 12:** Section II.A.1: Please add some text to include the ERA and Post-MILCON evaluation similar to the previous sentence regarding the HHRA.

**Response:** The last sentence was revised to state, “The Ecological Risk Assessment (ERA) and Post-MILCON Action Evaluation identified potentially unacceptable

ecological risks to lower-trophic-level receptors from exposure to copper, lead, mercury, and zinc in sediment”

**Comment 13: Section II.A.3:** The first paragraph on this page calls out 22 outfalls (11 non-regulated stormwater, 8 regulated stormwater and 3 regulated process). Please resolve the difference.

**Response:** The text has been revised to reflect 22 outfalls.

**Comment 14: Section II.A.3:** add the following sentence to the end of the last paragraph, “Recreational swimming, fishing, and crabbing are not permitted in Desert Cove.”

**Response:** The sentence has been added.

**Comment 15: Section V.A:** Please revise the sentence to clearly convey that this removal action will address ecological risks from sediment and that the anticipated “no further action (NFA)” ROD will address sediment and surface water.

**Response:** The sentence was revised to state, “Upon completion of the removal action, potential risk from ecological receptor exposure to sediment will be mitigated and NFA for sediment and surface water at SWMU 7b will be documented in a Proposed Plan and ROD.”

**Comment 16: Section V.A.2:** EPA suggests utilizing the same language in the SWMU 3 Action Memorandum.

**Response:** The sentence has been revised to state the following, “This NTCRA will mitigate potentially unacceptable risks from exposure to sediment within the SWMU 7b removal action area through removal of metals contaminated sediment.”

**Comment 17: Section V.A.2:** Please revise the sentence to clearly convey that this removal action will address ecological risks from sediment and that the anticipated “no further action (NFA)” ROD will address sediment and surface water.

**Response:** The last sentence was revised to state, “Upon completion of the removal action, potential risk from ecological receptor exposure to sediment will be mitigated and NFA for sediment and surface water at SWMU 7b will be documented in a Proposed Plan and ROD.”

**Comment 18: Section V.A.2:** Please revise the sentence to clearly convey that this removal action will address ecological risks from sediment and that the anticipated “no further action (NFA)” ROD will address sediment and surface water.

**Response:** The last sentence was revised to state, “Upon completion of the removal action, potential risk from ecological receptor exposure to sediment will be mitigated and NFA for sediment and surface water at SWMU 7b will be documented in a Proposed Plan and ROD.”

**Comment 19:** There is no call out to this reference in the body of the document.

**Response:** The reference has been removed.

The above response (and other Team comments/responses) will be incorporated into the final version of the SWMU 7b Action Memorandum.

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

Sincerely,

**Nathaniel A Price**

Digitally signed by Nathaniel A Price  
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Nathaniel Price, P.E.  
Project Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic  
Mr. Paul Herman, P.E./VDEQ  
Ms. Cecilia Landin/CH2M HILL  
Administrative Record File