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LETTER AND RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY  
COMMENTS ON DRAFT ENGINEERING EVALUATION/COST ANALYSIS FOR SOLID  
WASTE MANAGEMENT UNIT 3 (SWMU3) PIER 10 SANDBLAST YARD JEB LITTLE CREEK

VA  
10/22/2012  
CH2MHILL



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October 22, 2012

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

Subject: Responses to VDEQ Comments on the  
*Draft Final Engineering Evaluation/Cost Analysis for Solid Waste Management Unit 3  
Pier 10 Sandblast Yard*  
Joint Expeditionary Base Little Creek, Virginia Beach, Virginia  
Navy CLEAN 1000, Contract N62470-08-D-1000, Task Order WE07

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments from VDEQ received via email on October 17, 2012 on the *Draft Final Engineering Evaluation/Cost Analysis for Solid Waste Management Unit 3 Pier 10 Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, October 2012):

**Comment 5:** Sections 4.1.2, 4.1.3, and 4.1.4, Dewatering and Solidification: VDEQ requests the onsite temporary water treatment system discharge through a monitored VPDES permitted outfall. The VPDES requirements for discharges to Little Creek Harbor are defined in the VPDES permit VA0079928. VPDES permit VA0079928 Outfalls 006 and 008 are in the vicinity of this proposed removal action. Outfall 008 is strictly a stormwater outfall, has no monitoring requirements, and is not suitable to receive other process-type wastewater. Outfall 006 is monitored and is permitted to discharge process wastewater generated by the dry dock. The wastewater generated by the dry dock process was characterized as part of the VPDES permit application and VA0079928 is written to address this waste stream. The wastewater generated by the onsite temporary water treatment system to manage wastewater from the sediment dewatering process was not identified as a waste stream in the VPDES permit application and is not covered by VA0079928. Therefore, the effluent from the temporary water treatment system to manage wastewater from the sediment dewatering process must be discharged via VPDES - VA0079928 Outfall 006 and must meet the Virginia Water Quality Standards prior to discharge to the Little Creek Harbor.

**Response:** The MILCON contractor will be utilizing a water filtration system that will be located on the scow to decant the dredged sediment. The previously discussed onsite temporary water treatment system will not be utilized for Alternatives 2 and 3 and as such discharge through a monitored VPDES permitted outfall will not be required for these alternatives. 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 Little Creek Harbor. No wastewater will be discharged through Outfall 006. Alternative 4 language has been updating accordingly.

*VDEQ Response: The discharge of any water from this process, whether it is discharged via a permitted outfall or not, must meet Virginia Water Quality Standards as required in the MILCON dredge permit (08-RP-19 Section VI - Special Condition for Discharges #1).*

**Response:** The SWMU 3 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 3 will be conducted while meeting the intent of Nationwide Permit 38. Further discussion of water quality is provided in the response to Comment 8. No changes to the ARARs table were made.

**Comment 8:** Appendix A, Table A-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 must meet surface water quality standards.

**Response:** Alternatives 2 and 3 no longer include water treatment or any use that will alter its composition from background. Therefore the numerical standards contained within 9 VAC 25-260-140 are neither applicable nor relevant and appropriate for these alternatives. Alternative 4 does include water treatment for the removal of contaminated solids. The process includes filtration and treatment with a cationic polymer. Based on this, the requested regulation was added as a chemical-specific ARAR that is applicable to Alternative 4.

*VDEQ Response: Please include the Virginia Water Quality Standards as an applicable ARAR as any water discharged during implementation of any of the alternatives must meet Virginia Water Quality Standards as required in the MILCON dredge permit (08-RP-19 Section VI - Special Condition for Discharges #1).*

**Response:** As discussed in the response to Comment 7, this CERCLA action will not be conducted under the umbrella of the MILCON permit or Norfolk Regional Permit 08-RP-19. This site has been investigated and surface water has not been identified as a media of concern. This action will be conducted under NWP38. The State Water Control Board has provided unconditional §401 Water Quality Certification for all of the Norfolk District regional conditions, including NWP38, as meeting the requirements of the Virginia Water Protection Permit Regulation, which serves as the Commonwealth's §401 Water Quality Certification. As a result, monitoring will be limited to visual changes in turbidity as outlined in the Virginia action-specific ARARs for sediment and erosion control. No changes to the ARARs table were made.

Please do not hesitate to contact me at 757-671-6266 if you have any questions concerning these responses.

Sincerely,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

Cecilia Landin  
Project Manager

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