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NAB LITTLE CREEK
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LETTER AND THE U S NAVY RESPONSE TO THE VIRGINIA DEPARTMENT OF
ENVIRONMENTAL QUALITY COMMENTS ON THE DRAFT REMEDIATION AREA
DELINEATION SEDIMENT SAMPLING WORK PLAN AND SAMPLING AND ANALYSIS PLAN
SOLID WASTE MANAGEMENT UNIT 3 (SWMU3) PIER 10 SANDBLAST YARD AND SOLID
WASTE MANAGEMENT UNIT 7B (SWMU7B) SMALL BOATS SANDBLAST YARD (DESERT
COVE) JEB LITTLE CREEK VA

1/4/2013
CH2MHILL



CH2M HILL
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Virginia Beach, VA 23462
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January 4, 2013

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 Remediation Area Delineation Sediment Sampling Work Plan and Sampling and Analysis Plan, Solid Waste Management Unit 3 – Pier 10 Sandblast Yard and 7b –Small Boats Sandblast Yard (Desert Cove)
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 on November 21, 2012 on the *Draft Remediation Area Delineation Sediment Sampling Work Plan and Sampling and Analysis Plan, Solid Waste Management Unit 3 – Pier 10 Sandblast Yard and 7b –Small Boats Sandblast Yard (Desert Cove), Joint Expeditionary Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, October 2012):

Comment 1: Executive Summary: In the 5th paragraph the term “constituents of concern” is used. Shouldn’t that read “chemicals of concern”? In the 5th paragraph please revise the sentence discussing the layer of petroleum-like material to note it is “not related to the SWMU 3 sandblasting activities”. In the 6th paragraph please consider revising the 2nd sentence as follows, “During these operations the sandblasting residue accumulated on the ground surface. Historical releases at SWMU 7b likely occurred when runoff containing sandblast residue discharged to Desert Cove.” In the last sentence of the 6th paragraph, please change the 1st use of the word “delineate” to “define”.

Response: In line with the SWMU 3 and SWMU 7b EE/CAs, “constituents of concern” has been revised to “contaminants of concern”. The sentence in the 5th paragraph was revised to read: “A layer of petroleum-like material, not related to past SWMU 3 CERCLA activities, has been observed in sediment across the site.” The 2nd sentence of the 6th paragraph was revised as requested. The last sentence of the 6th paragraph was revised as requested.

Comment 2: Worksheet 10-1, Ecological Risk Summary: In the 3rd sentence of the 2nd paragraph it seems to say a mercury/ABM content correlation was not performed. Please consider replacing “were not correlated with ABM content” with “did not correlate with ABM content” or “showed little correlation with ABM content”. At the end of the sentence, please

insert a comparator, x of y samples, to show the spatial limits. Please reword the end of the last sentence as follows, “not considered a result of *this* CERCLA release.

Response: The 3rd sentence of the 2nd paragraph was revised to read: “...did not correlate with ABM content...”. A comparator was added to the end of the sentence as requested. The last sentence was revised as requested.

Comment 3: Worksheet 10-1, Delineation of Lateral and Vertical Extent of Impacted Sediment: In the 7th sentence please add the depth of the sediment cores collected from each grid.

Response: The sentence was revised to indicate the collection of 12-foot sediment cores.

Comment 4: Worksheet 10-1, Non-time Critical Removal Action: When discussing grids 509, 551, and 559 even though ABM is not a PRG it may not hurt to note they contain less than 1% ABM.

Response: The following sentence was added “Additionally, ABM content in these grids is less than 1 percent.”

Comment 5: Worksheet 10-1, Project Objectives: Please consider qualifying the term “vertical extent” in the 2nd sentence as follows, “to re-define the vertical extent of metals contamination (PRGs) within the CERCLA sediment remediation area”. Please reword the opening of the 3rd sentence as follows, “A layer of petroleum-like material, not related to this CERCLA release,...”.

Response: The sentence was revised to read: “Therefore, the primary objective of this investigation is to re-define the vertical extent of metals contamination (defined as individual RS above 1.5 and average RQs above 1) within the CERCLA sediment remediation area.” The 3rd sentence was revised as requested.

Comment 6: Worksheet 11: Please consider replacing the term “six-inch-interval sediment samples” with “six-inch-long sediment samples”. This change should make it clear that at each prescribed interval a 6-inch-long sample of sediment will be collected.

Response: The suggested revision was made throughout the document.

The above response (and other Team comments/responses) will be incorporated into the final version of the UFP SAP.

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

Sincerely,



Cecilia A.W. Landin
Project Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Jeffrey Boylan/USEPA
Administrative Record File