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LETTER REGARDING U S NAVY RESPONSES TO U S EPA REGION III COMMENTS ON
THE DRAFT TECHNICAL MEMORANDUM NON-TIME CRITICAL REMOVAL ACTION
PROJECT COMPLETION SUMMARY FOR SOLID WASTE MANAGEMENT UNIT 3 (SWMU 3)
PIER 10 SANDBLAST YARD AND SOLID WASTE MANAGEMENT UNIT 7B SMALL BOATS
SANDBLAST YARD JEB LITTLE CREEK VA

9/13/2013
CH2M HILL



CH2M HILL
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Virginia Beach, VA 23462
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September 13, 2013

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

Subject: Responses to USEPA comments on the *Draft Technical Memorandum, Non-Time Critical Removal Action Project Completion Summary, SWMU 3 – Pier 10 Sandblast Yard and SWMU 7b – Small Boats Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia, Navy CLEAN 8012, Contract N62470-11-D-8012, Task Order WE65*

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL is pleased to submit the following responses to the comments received from EPA via email on September 3, 2013 on the *Draft Technical Memorandum, Non-Time Critical Removal Action Project Completion Summary, SWMU 3 – Pier 10 Sandblast Yard and SWMU 7b – Small Boats Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia (CH2M HILL, August 2013)*:

Comment 1: Section 1.5: In the 1st sentence of the 1st paragraph, change “compounds” to “contaminants”.

Response: Text revised to read, “The objectives of the SWMU 3 and SWMU 7b NTCRAs were to reduce or eliminate contaminants determined to pose potential unacceptable risk to ecological receptors in sediment at each site and to achieve long-term site remediation to be protective of human health and the environment.”

Comment 2: General: Update all references of the “dry dock” to “floating dry dock”.

Response: Text updated throughout as suggested.

Comment 3: Section 3.2: Revise the 4th sentence to clarify how the grab samples were collected.

Response: Text revised to read, “Waste characterization samples were collected concurrently with the delineation samples. Three-point composite sediment samples were collected and consisted of grab sediment samples collected from the three sediment cores retrieved from each grid cell. Grab sediment samples were collected

from 0 to 3 feet and 3 to 6 feet, and corresponding depth intervals were homogenized prior to placement into sample containers.”

Comment 4: Section 3.3.1: Revise the number of cells each of the original 16 grid cells was subdivided into from 4 to 16.

Response: Text updated as suggested.

Comment 5: Section 3.4.1: Please define how often the oil booms were inspected (i.e weekly, daily, random).

Response: 3rd sentence of 2nd paragraph was revised to read: “Oil booms were inspected daily during dredging operations and replaced as needed due to saturation. “

Comment 6: Section 3.4.1: Please revise the last sentence of the 4th paragraph to read more clearly.

Response: Text revised to read, “Dredging operations were continuously monitored to ensure there was no excessive loss of suspended sediments during transfer to the hopper scows and to ensure the turbidity and sheens contained within turbidity curtains and oil booms were kept to a minimum.”

Comment 7: Section 3.4.1: Please add language to explain why some grid cells were inaccessible and were not dredged.

Response: Text revised to read, “Due to their proximity to the shoreline and required draft depth for the dredge barge and hopper scow, sub-grid cells 167, 193 and 194 located in primary grid cell 1 were not dredged and therefore did not exhibit the required dredge depths.”

Comment 8: Section 3.4.1: In the last sentence of this section, please add “and considered satisfactory” after “error”.

Response: Text revised to read, “Sub-grid cell 210 located in primary grid cell 8, sub-grid cell 50 located in primary grid cell 11, and sub-grid cell 38 located in primary grid cell 12 did not exhibit the required dredge depths but were within a 10% margin of error and considered satisfactory.

Comment 9: Section 3.4.2: In the 2nd paragraph please specify the “Disposal Facility” receiving the decontamination fluids and include the quantity of water disposed.

Response: A discussion of the decontamination fluid has been added to the 2nd paragraph. Text revised to read, “Following the final offload of material, each barge was towed to McLean’s South Norfolk, Virginia Yard for decontamination using non-potable water, push brooms, and mops. To minimize the consumption of rinse water, the water was filtered through silt bags, pumped and collected in a tank for reuse for decontamination of each of the four barges. After all barges were

decontaminated, the decontamination fluids were contained and sampled for characterization. Four samples were collected and analyzed for full TCLP, sulfide, cyanide, pH, and flashpoint. Waste characterization data are provided in **Attachment H**. Based upon the sampling results, decontamination fluids were determined by McLean to be non-hazardous, and the stored rinse water was utilized at McLean's South Norfolk, Virginia yard for dust control purposes."

Comment 10: Section 5: Please add an additional paragraph(s) describing all deviations from the work plan.

Response: Section 4.2 was added to address deviations from the action memorandums and work plan.

Please do not hesitate to contact me at 504-832-9515 if you have any questions concerning these responses.

Sincerely,



Brooke Harris
Project Manager

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