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February 17, 1998

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138768

Commander  
LANTNAVFACENGCOM  
Attention: Code 18222 Mr. Bob Schirmer  
Lafayette Annex, Building A  
6500 Hampton Boulevard  
Norfolk, VA 23511-6287

Dear Mr. Schirmer:

Subject: Contract N62470-95-D-6007  
Navy CLEAN II Program  
Contract Task Order 0024

This letter presents responses to comments made by Virginia Department of Environmental Quality (VDEQ) on the Draft Final Groundwater Monitoring Report for Sites 5 and 11 at Naval Amphibious Base Little Creek, Virginia Beach, Virginia. Initial comments by VDEQ are included as an attachment.

Response to Comment #1: The sentence indicating that no further monitoring or remedial activities are planned for the sites will be deleted from Section 1.1, pg. 1-1.

Response to Comment #2: The data for specific conductance from Round 1 (5/26/96) was presented in the units "millivolts", which is inappropriate for this field parameter (should be read in micromhos/centimeter). Foster Wheeler Environmental Services, which collected this data, could not rectify the issue. The inputs for specific conductance (Round 1) on Table 2-2, Section 2.1, pg. 2-2 will be modified from "data determined to be unreliable" to "nr", indicating that no readings were collected during Round 1.

Response to Comment #3: Table 4-1, pg. 4-2, will be revised to reflect that the groundwater flow is to the west, based on the December 1996 groundwater data.

Response to Comment #4: A footnote, explaining the "U" qualifier will be incorporated into Table 3-1, pg. 3-2. The "U" qualifier indicates that the contaminant was not detected above the stated detection limit (i.e. - 10U, where 10 equals the detection limit).

Response to Comment #5: The future incremental cancer risks to residential receptors for exposure to volatile organic compounds (VOCs) in the groundwater were in the

COMMANDER  
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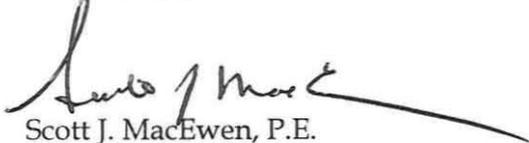
$1 \times 10^{-6}$  -  $1 \times 10^{-4}$  range. There are no unacceptable risks for exposure to VOCs in the groundwater under the current exposure scenario. Section 4.2 will be revised accordingly.

Response to Comment #6: The approach to conducting the additional work at Site 11 will be presented to VDEQ in a workplan for review.

If you have any comments or questions, please call me at (703) 471-6405, x4332.

Sincerely,

CH2M HILL

A handwritten signature in black ink, appearing to read "Scott J. MacEwen", with a long horizontal flourish extending to the right.

Scott J. MacEwen, P.E.  
Activity Manager

Enclosure

cc: Ms. Kelly Greaser/NAB Little Creek  
Mr. Robert Weld/VDEQ  
Mr. Harry Harbold/EPA  
Mr. Bob Root/CH2M HILL  
Ms. Jayanti Aggarwal/CH2M HILL  
File

**VDEQ Comments and Questions on  
Draft Final Groundwater Monitoring Report for Sites 5 and 11  
Naval Amphibious Base Little Creek (NABLC), Virginia Beach, Virginia**

- 1) Section 1.1, pg. 1-1: This section indicates that no further monitoring or remedial activities are planned for these sites. However, Section 4.2, page 4-3 recommends additional work be performed at Site 11. Please explain the discrepancy. VDEQ agrees that additional work is necessary at Site 11 to characterize the VOC contamination in the groundwater.
- 2) Section 2.1, pg. 2-2, Table 2-2: Please provide a rationale for why the specific conductance data was determined to be unreliable for the 5-21-96 sampling event.
- 3) Section 2.2, pg. 2-4, Figure 2-2: This figure indicates that the direction of groundwater flow is to the west based on water table elevations from the December 1996 sampling event. However, Table 4-1 (page 4-2) indicates that groundwater flow is to the southwest based December 1996 groundwater data. Please correct Figure 2-2 or clarify the issue.
- 4) Table 3-1, pg. 3-2: It is assumed that the data qualifier "U" indicates that the contaminant was not detected above the stated detection limit (i.e. - 10U, where 10 equals the detection limit). Please provide a footnote explaining the "U" qualifier.
- 5) Section 4.2, pg. 4-1, Last Paragraph: The paragraph indicates the baseline risk assessment conducted as part of the 1994 RI/FS did not find any current or future risk associated with metals in groundwater at Site 11. What did the risk assessment show with regard to risk associated with the VOC contamination in groundwater at Site 11?
- 6) Section 4.2, pg. 4-3, Last Paragraph: VDEQ agrees that additional work is necessary to fully characterize the VOC contamination in groundwater at Site 11. Please ensure that VDEQ has an opportunity to review the work plan prior to the work being performed. A scoping meeting, which includes VDEQ, to develop an appropriate course of action for future work is recommended.

*End of Comments*