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IN REPLY REFER TO:

5090
Ser N462/ 2842
18 OCT 1998

From: Commanding Officer, Naval Amphibious Base Little Creek
To: Commander, Atlantic Division, Naval Facilities Engineering
Command (Code 18223)

Subj: COMMENTS ON THE DRAFT WORK PLAN AND SAMPLING AND ANALYSIS
PLAN FOR GROUNDWATER MONITORING AT SITES 5, 9, 10, AND 11

Encl: (1) Comments on the Draft Work Plan and Sampling and
Analysis Plan for Groundwater Monitoring at
Sites 5, 9, 10, and 11

1. Enclosure (1) is forwarded for inclusion in the final
comments list for the Draft Work Plans prepared by CH2M HILL.

2. For additional information, my point of contact for this
matter is Kelly Greaser at 363-4571.

A handwritten signature in black ink, appearing to read "W. L. Niven".

W. L. NIVEN
By direction

NAB LITTLE CREEK

COMMENTS ON THE DRAFT WORK PLAN AND

SAMPLING AND ANALYSIS PLAN FOR GROUNDWATER MONITORING

AT SITES 5, 9, 10, AND 11

In General - For Sites 9 and 10 all references to the number of rounds of sampling should reflect that the program will be reevaluated after six rounds and may be changed to annual monitoring. Therefore, there may be a MAXIMUM of ten rounds in five years and a minimum of eight rounds.

not → Change all references of Navy Level C to Navy Level D.

Page 1-1 - Change (2) in the paragraph after the bullets to: "conduct groundwater sampling at the four sites;"

Page 2-7 - The paragraph at the top of the page refers to sites 7, 9-13 and 5 and 16. However, sites other than 5, 9, 10, and 11 have not been named. These extra sites should be identified here.

Page 3-1 - The third and fourth paragraphs contain three references to the IRI. These should be changed to the PSI, since site 5 was not investigated in the IRI. This change from IRI to PSI should be made in the QAPP as well. Also, move the last sentence of the fourth paragraph to follow the second sentence of the third paragraph. This same type of change should be made for all the sites. In other words, figures showing sampling locations should be identified as soon as any samples are discussed. Change the last sentence of the third paragraph to: "All four monitoring wells contained levels of lead below Virginia State Water Control Board limits." Change the second sentence of the fifth paragraph to: "Two rounds of verification groundwater monitoring is proposed to verify ...". Change the third sentence of the fifth paragraph to: "... will be assessed and evaluated after the two rounds of sampling and ...". At the end of the paragraph add: "The second round of sampling is proposed for the fall of 1996."

Page 3-3 - Delete the second comma after PCBs in the third sentence of the first paragraph: "... acids, bases, PCBs,, and other ...". Change the first sentence of the fifth paragraph to: "... assessment indicate that no current risk is posed by ...".

Page 3-5 - The second sentence of the second paragraph should state whether the VOCs and pesticide detected were the same as detected before. Change the first sentence of the second paragraph to: "... assessment indicate that no current risk is posed by ...". Change the second sentence to: "A long-term monitoring ...". Change "8 feet" to "11 feet" in the first

Enclosure (1)

sentence of the fifth paragraph. Insert the word "storm" before "sewer system." in the second to last sentence of the sixth paragraph.

Page 3-7 - Change "1996" in the first sentence to "1995". Change the second to last sentence to: "... will be assessed and evaluated after two rounds of sampling and analysis ...".

Page 4-1 - Delete the words "long term" in the first sentence of the first paragraph

Page 4-2 - Delete the "s" from "Sites 5" in the last sentence in the paragraph after the bullets.

Page 4-3 - Insert the word "at" before "NAB Little Creek." at the end of the first sentence of the second paragraph. Replace "Amphibious Naval Base, Norfolk" with "NAB Little Creek" in the second to last sentence of the sixth paragraph.

Page 4-4 - Change the first paragraph to: "... site for each round of groundwater sampling." Delete the word "the" before "LANTDIV" in the second to last sentence of the second paragraph. Change the first sentence of the third paragraph to: "... Site 5 and Site 11, and a possible ten rounds of groundwater ...". Change the second sentence of the seventh paragraph to: "... contents of the landfill and its proximity to ...". Change the fourth sentence to: "This equates to a maximum of ten, possibly eight rounds of sampling."

Page 4-6 - Note - this page should be 4-5. The second and sixth paragraphs refer to the 1993 RI/FS. These should be changed to the 1994 RI/FS. The field work was done in 1993, but the document was final in 1994. Change the first sentence of the fourth paragraph to: "... site indicate that no current risk is posed by ...". For both Sites 9 and 10, there is a risk in the future residential scenario.

Page 4-8 - Change the first sentence of the first paragraph to: "... proposed to verify the effectiveness of the recently completed source ...".

Page 4-10 - Change "Site" in the first sentence of the sixth paragraph to "Sites". Change the second sentence of the seventh paragraph to: "... have been exceeded, the program will be evaluated."

Page 4-11 - Change "Site" in the second to last sentence of the first paragraph to "Sites". Delete the period at the end of the third bullet. Change the last bullet to: "... for future monitoring and/or actions."

Page 5-1 - Delete the word "appropriate" from the second sentence of the last paragraph.

Page 5-2 - Delete the "r" in the last word on the page.

Table 5-1 - Delete "Code" from N462. Insert my Fax Number into the table: 757-464-7060. The proper zip code for BCE is 23521-2616.

Field Sampling Plan Page 1-1 - Change the last sentence on the page to: "... whether additional sampling rounds is necessary."

Health and Safety Plan Page 1 - Change 1,500 in the first sentence after the bullets to 2,100 since the base is 2,147 acres.

Investigation-Derived Waste Management Plan Page 2-1 - Change the first sentence of the fourth paragraph to: "... waste management recommendations to the Navy." Also, do not submit anything to the EPA on this issue. The Navy will submit all necessary information to the proper regulatory authorities if required.

Page 3-1 - Change the third bullet to: "... without permission from Base Civil Engineering N462 Kelly Greaser." Change the example accordingly. Change the first sentence of the following paragraph to: "... will be stockpiled within the facility at a location ...". Also, change the rest of the submittals similarly. Due to base operations, the drums cannot be stored on each site. The drums will be stored in our drum storage compound. Therefore, any references to storing drums "on-site" should be changed to "on the facility", which includes the entire base.