

04.01-11/21/97-00252

TELEPHONE NO



DEPARTMENT OF THE NAVY

ATLANTIC DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1510 GILBERT ST  
NORFOLK, VA 23511-2699

(757) 322-4788

IN REPLY REFER TO:

5090

18223:SRP:swj

NOV 21 1997

United States Environmental Protection Agency  
Attn: Mr. Robert Stroud (3HW71)  
USEPA Region III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Re: Response to Comments on Draft Final Feasibility  
Study for Site 7, Amphibious Base Landfill, Naval  
Amphibious Base Little Creek, Virginia Beach,  
Virginia

Dear Mr. Stroud:

The Atlantic Division, Naval Facilities Engineering Command is pleased to enclose one copy of the subject document to you for review. The Response to Comments should help facilitate your review of the Decision Document for Site 7. Your comments on the Decision Document are requested by December 1, 1997 or sooner to maintain project schedules.

The subject document has also been distributed to Virginia Department of Environmental Quality and all Restoration Advisory Board members requesting a copy.

If you have questions, please contact me at (757) 322-4788.

Sincerely,

A handwritten signature in black ink, appearing to read "S. R. Park".

S. R. PARK  
Remedial Project Manager  
Installation Restoration Section  
(North)  
Environmental Programs Branch  
Environmental Division  
By direction of the Commander

Enclosure

Copy To:  
NAVAL FACILITIES ENGINEERING COMMAND Little Creek

Quality Performance ... Quality Results

**Responses to VDEQ Comments on the  
Draft Final Feasibility Study  
Site 7 : Amphibious Base Landfill  
Naval Amphibious Base Little Creek (NABLC), Norfolk, Virginia**

- 1.) Section 1.2, pg. 1-5, 1st para: This paragraph indicates that the landfill was used for temporary storage of wastes after it was closed. Specifically, what type of wastes were stored at the landfill and for how long?

**Response:** Section 2.2.1, page 2-12 of the Supplemental Ecological Assessment (SEA) identifies the waste activities which occurred at the landfill during the stormwater survey. Specific records of the wastes stored at the landfill were not kept, however, records indicate that all material was "inert". Wastes were stored at the site prior to disposal or recycling. The specific length of time these wastes were stored at the site, was not recorded.

- 2.) Section 1.4, pg. 1-24, 3rd para: Same comment as above.

**Response:** As stated above, only inert material was stored on-site. All records indicate that any PCB containing material was stored elsewhere at the base. This segregation was maintained to avoid violation of regulations pertaining to storage of various waste-types.

- 3.) Section 1.6, pg. 1-26, Last Bullet: Additional discussion regarding ecological assessments and potential impacts from Site 7 is necessary. It should be noted that the Supplemental Ecological Assessment (SEA) for NABLC is not yet finalized and there are still outstanding concerns associated with the report that may have an impact on Site 7. Specifically, groundwater transport to the surface water pathway.

**Response:** Issues raised by the SEA will be addressed in the Responsiveness Summary for the SEA.

- 4.) Section 2.1.3, pg. 2-22, 6th para: Please provide further explanation and/or a citation regarding VDEQ's delegation of authority to LANDTDIV regarding land disturbing activities.

**Response:** LANTDIV is authorized to review and approve Erosion and Sediment Control Plans for land disturbing activities through an agreement with the Virginia Department of Conservation and Recreation's Division of Soil and Water Conservation. The agreement is renewed annually by letter. LANTDIV is currently in the process of renewing their authority. In the meantime, verbal authority to continue the review and approval process has been provided by John T. Baranowski, Training and Certification Coordinator, Virginia Department of Conservation and Recreation. Mr. Baranowski can be reached at 804-371-7532.

- 5.) Section 2.2, pg. 2-24: A Remedial Action Objective (RAO) should be added which includes the mitigation of ecological risks attributable to Site 7. This may be dependent upon discussion of Comment #3 and the resolution of comments on the SEA.

**Response:** See response to Comment #3 above.

- 6.) Section 4.2.1, pg. 4-7, Last para: In a NABLC letter dated September 9, 1994, from W.L. Niven, it is stated that "In the future, surface water samples will be analyzed for cyanide" at Site 7 (Site 7, Section 7-3). This was in response to comments received from VDEQ on the Draft Final RI/FS for NABLC (letter dated July 15, 1994 from Erica S. Dameron). Please explain why cyanide is not included in the list of analyses that is outlined for the monitoring plan under this alternative and others.

**Response:** Cyanide will be added to the list of analyses for the monitoring plan under the various alternatives. The Navy proposes if after two to four rounds of sampling cyanide is non-detect in all samples, analysis of cyanide will be dropped from the sampling program.

- 7.) Section 4.2.1, pg. 4-8, 2nd para: Will monitoring reports be generated on a semi-annual basis that document the results of the sampling and comparison to trigger levels? These reports should be submitted for regulatory review.

**Response:** Data summaries will be provided on a semi-annual basis. A formal report will be prepared after three years of sampling (This will allow time to assemble a reliable database from which to determine trends and potential data gaps). The report will be submitted for regulatory review, and will include a detailed discussion of analytical results and recommendations for future sampling. Proposed changes in sample frequency, analytical parameters, and/or sample locations may also be presented in this report.

8.) Section 6.0, pg. 6-1, 2nd bullet: The term “standard practice” needs to be more clearly defined. Are there any instances where the locality is likely to allow use of the shallow aquifer as a potable source?

**Response:** The 2<sup>nd</sup> bullet on page 6-1 will be replaced with, “Present or future use of the shallow aquifer as a potable water source will be controlled by land use restrictions. The land use restrictions will be implemented by notation in the NAB Little Creek Base Master Plan, the comprehensive planning document consulted by base personnel when making planning, development, and construction decisions, and by documenting the restrictions in the NAB Little Creek real estate files maintained by the Atlantic Division, Naval Facilities Engineering Command.” In addition, Base Operating Departments will be required to notify and receive concurrence from the Base Civil Engineer Environmental Office prior to all intrusive activities in the vicinity of the site.