

12/9/04 - 00818



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

9 December 2004

Commander, Atlantic Division
Naval Facilities Engineering Command
Environmental Quality Division, Code: 1823
1510 Gilbert Street
Norfolk, Virginia 23511-2699
Attn.: Ms. Dawn Hayes

Re: *Draft Engineering Evaluation / Cost Analysis for Amphibious Base Landfill, Site 7*
Naval Amphibious Base Little Creek
Virginia Beach, Virginia

Dear Ms. Hayes:

The above referenced document has been reviewed by the Environmental Protection Agency. While we concur with the recommended alternative the following comments are offered.

General Comments

1. The additional information that is requested to be added to the document will help to further support the proposed action. This may be particularly useful given the inclusion of Appendix A which includes the recommendation to delay an IRA pending the definition of site specific ecological risk associated with canal sediment.
2. Alternative 3 includes the removal of surface debris from the edge of the landfill. Removal of this debris provides the opportunity to restore tidal wetlands by not backfilling. Elevations in existing wetlands could be used to determine the target elevation for the wetlands. Wetlands could also be restored along the edge of the canal when the road crossing is removed. This approach should save money as these areas would not need to be backfilled. For areas where debris is on the shoreline, removal of the debris provides the opportunity for restoration of the shoreline, so that vegetation can become established.

Specific Comments

1. Section 2.2.10 on page 2-7 states that the ERA suggests that potential exposure and risk to lower trophic level receptors are possible in the central portion of the canal. However, the habitat value of this drainage canal is minimal, so exposures are likely to be low.

There is no data presented to support this statement. A recent site visit showed vegetated wetlands and tidal mudflats in this canal, and the presence of invertebrates (including oysters), suggesting that the canal does provide habitat for ecological receptors.

2. Section 2.2.12 on page 2-8 provides a summary of the surface debris located along the shoreline of the landfill. The section states that approximately 55 cubic yards of debris are present. A recent site visit on November 10, 2004 with BTAG found that several of these debris areas are much larger than the estimates in Figure 2-2, and some extend into the subsurface. The information presented in Figure 2-2 should be revised to reflect the information collected as part of the recent site visit.
3. Section 4.1 provides a description of the alternatives evaluated as part of this EE/CA. Alternatives 2 and 3 include a component that includes the removal of one foot of sediment from the canal for a distance of 885 feet. The site visit on November 10, 2004 found that the canal contains several areas of tidal vegetated wetlands and intertidal mudflats. If these wetlands or mudflats are excavated, these areas should be backfilled to the same elevation and vegetated (in the case of vegetated wetlands). This should include taking elevations prior to the removal and after backfill placement to ensure the same elevation is achieved.

If you have any questions concerning any of these comments, please call me (215) 814-5129.

Sincerely,

Mary T. Cooke
Remedial Project Manager

cc: Lora Fly, CNRMA
Paul E. Herman, VDEQ
Donna Caldwell, CH2M HILL