

7/31/06 - 00988

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July 31, 2006

Mr. Paul Herman, P.E.  
Remedial Project Manager  
Virginia Department of Environmental Quality  
629 East Main Street, 4th Floor  
Richmond, VA 23219

Subject: Final Treatability Study Report  
Site 11a, NAB Little Creek, Virginia Beach, Virginia

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received from VDEQ on the Draft Treatability Study Report for the Site 11a, NAB Little Creek, Virginia Beach, Virginia:

1. Section 3.3.2: In the 1<sup>st</sup> sentence of the 2<sup>nd</sup> paragraph replace one of the two MW31D's that appear in the parentheses with MW32D.

**The text has been revised accordingly.**

2. Section 4.1: What impact did the addition of ISCO have on ecological receptors (soil dwellers)? How long will the ISCO remain in the aquifer? What effects will its presence have in the short and long term? Does an entirely different type of contamination exist in the aquifer? Please provide conclusions concerning the condition of the aquifer post implementation of the Study.

**The chemical oxidant used for this treatment remained in the aquifer only a few weeks following injection. Implementation of ISCO at Site 11a was not expected to impact ecological receptors. The findings of the Treatability Study Report define the short term conditions of the aquifer following injection. In the long term, the aquifer is expected to return to a pre-treatment condition. The condition of the aquifer, including an evaluation of human and ecological risk, will be assessed during the RI.**

3. Section 4.2: At the end of the 3<sup>rd</sup> sentence, following the phrase "Conceptual Site Model", please add the following phrase, "and fully characterize the current state of the aquifer". At the end of the 4<sup>th</sup> sentence following the phrase, "further site characterization" please add the phrase, "as well as a full suite of chemical analyses to determine the state of the aquifer following the ISCO Treatability Study."

**The text has been revised accordingly.**

If you have any questions concerning any of these comments, please call me at (757) 671-8311 ext. 439

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie Butler".

Jamie Butler  
Project Manager

cc: Mr. Scott Park/NAVFAC Mid Atlantic  
Mr. Jeffrey Boylan, USEPA Region III  
Ms. Mary Cooke, USEPA Region III  
Ms. Donna Caldwell, CH2M HILL