



**DEPARTMENT OF THE NAVY**

Commander  
Naval Base Norfolk  
1530 Gilbert ST. STE 200  
Norfolk, VA 23511-2797

8/15/96-01191

IN REPLY REFER TO:  
5090  
N452/259  
**AUG 14 1996**

Mr. Alex Kalinowski  
Docket Coordinator  
Headquarters, US Environmental Protection Agency  
CERCLA Docket Office, Mail Code 5201G  
401 M Street, SW  
Washington, DC 20460

Dear Mr. Kalinowski:

Enclosure (1) are comments based upon the proposed rule in Monday, June 17, 1996's Federal Register (Vol. 61, No. 117), pages 30575-30579 regarding the proposed listing of Sewells Point Naval Complex, Norfolk Virginia on the National Priorities List.

For additional information, please contact Ms. Dianne Bailey at (757) 322-2900.

Sincerely,

CHERYL F. BARNETT  
Environmental Programs Department  
By direction of the Commander

Encl:

(1) Comments on Monday, June 17, 1996's Federal Register Notice

OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL**

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To	<i>Dave Forsythe</i>	From	<i>Dianne</i>
Dept./Agency	<i>LDV</i>	Phone #	
Fax #		Fax #	

NSN 7540-01-317-7368

5099-101

GENERAL SERVICES ADMINISTRATION

## Comments on Monday, June 17, 1996's Federal Register Notice

### PROPOSED LISTING OF SEWELLS POINT NAVAL COMPLEX NORFOLK, VIRGINIA TO THE NATIONAL PRIORITIES LIST

1. The name of the facility listed in the Federal Register is incorrectly named "Sewells Point Naval Complex." This was the name of the facility in 1983 when the Initial Assessment Study (IAS) was conducted. Since that time the name has been changed to Naval Base, Norfolk. Request that the name of the facility be changed in your files.
2. Throughout the scoring package, references to the Camp Allen Landfill do not include the Removal Action that was completed in 1994. The source of contamination at Area B was removed, the area was replaced with clean fill and revegetated. Specifically:
  - a) on pages 16 and 17 where the Navy's accomplishments are listed, no reference is made to the Removal Action completed at Area B,
  - b) on page 86 where observed releases are discussed, the Removal Action at Area B eliminated the "seep" (sample locations SDB-02 and SWB-02) that was cause for the release, and
  - c) on page 104 where observed releases are discussed, no reference is made to the Removal Action of 1994, which eliminated the source of contamination at Area B.Request that information on the Camp Allen Landfill Removal Action at Area B in 1994 be documented in the HRS scoring package.
3. The containment factor used for the Site 4 - Transformer Storage Area was based upon samples that were taken prior to the remediation of the site in 1992 (page 48). Soil was removed from around and directly adjacent to the storm drain inlet during remediation activities. Confirmation sampling of groundwater and soil in 1995 showed no elevated levels of PCBs at the site. Request that the containment factor be re-calculated.
4. The Navy disagrees with the containment factor assigned to Site 5 - Pesticide Drain Site. The highest value of 10 was assigned to this site; however, the last two sentences on page 54 refute this assumption. The sentences state that "...no pesticides were identified in the soil beyond 15 feet to the north, west, east or south of the french drain." and that the contaminants "...have not migrated any considerable distance from the source." On page 56, it states that the Willoughby Bay is "...approximately 1,500 feet north of the source." Request that the containment factor be re-evaluated.
5. The Navy disagrees with the containment factor of 10 assigned to Site 6 - CD Landfill. Remedial Investigation results, that were provided to EPA, show contaminants in the drainage ditches directly adjacent to the landfill. This can be attributed to runoff during actual landfill operations. However, sampling directly downstream from the landfill shows

no migration of contaminants, showing that any contaminants in the landfill are contained. Request that the containment factor be re-evaluated.

6. Request that the amounts detailed in the Hazardous Waste Stream table on page 74 be revised. These amounts represent waste that was disposed in the landfill from 1974. Sandblasting grit was not identified as a hazardous waste until 1981. Prior to that time, the waste was disposed in the landfill in accordance with a state permit. Amounts used in this table should reflect the amount disposed once the waste was identified as hazardous. The same situation applies to the amounts designated for the spent rice hulls and the fly ash.

7. The "concrete drain tunnel" identified in the table on page 80 is the Bousch Creek culvert that runs from the Camp Allen Landfill, under the Naval Air Station runway, across the Air Station and discharges to Willoughby Bay. This culvert begins as an open cement drainage ditch in the northern area of the Camp Allen Landfill. Many commercial off-site sources are tied into the culvert through drainage ditches east of Hampton Boulevard. The Navy is currently investigating the amount of flow from these sources. Request the assumption that all flow in the Bousch Creek culvert is attributable to the Camp Allen Landfill be re-evaluated.