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COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

Peter W. Schmidt
Director

P.O. Box 10009
Richmond, Virginia 23240-0009
(804) 762-4000

February 3, 1995

N.M. Johnson, P.E.
Head, Installation Restoration Section, North
Department of the Navy, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Re: ARARs Coordination - Camp Allen Landfill Site, Areas A
and B, Norfolk Naval Base

Dear Ms. Johnson:

Enclosed are initial comments from the Virginia Department of Environmental Quality's Office of the Superfund and Federal Facilities Restoration Program regarding the ARARs Coordination package for the above referenced site (please see attached).

Also, please be advised that:

1) The material provided in support of the proposed effluent discharge limits appears to be quite thorough. This section of the ARARs Coordination document has been forwarded to the appropriate DEQ VPDES permit staff for review and comment. The VPDES staff has agreed to review the material in order to facilitate the preparation of a permit application for the discharge.

2) The material related to soil and groundwater cleanup levels is currently being reviewed by the Program's toxicologist. Comments on cleanup levels will be provided in the very near future.

Thank you for your attention to these comments. Please call me at (804) 762-4201 if you have any questions.

Norfolk Naval Base
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Sincerely,

Erica S. Dameron

Erica S. Dameron
Acting Director,
Office of the Superfund and Federal
Facilities Restoration Program

Attachment

cc: Hassan A. Vakili

Comments on ARARs Table, ARARs Coordination Package
Camp Allen Landfill Site, Areas A and B, Norfolk Naval Base

1. The identification of VPDES as an ARAR may require some revision to indicate that this is a permitted activity. Also, the comments for the VPDES regulations should indicate that there are monitoring requirements associated with the discharge regulations.
2. The citation to the "Virginia Hazardous Waste Regulations", as used to identify requirements for the transport of hazardous materials, should be changed to "Virginia Hazardous Waste Management Regulations (VR 672-10-1, Parts VI and VII) and "Regulations Governing the Transportation of Hazardous Materials (VR 672-30-1)".
3. Some specific sections of Part X of the Virginia Hazardous Waste Management Regulations (VHWMR) are identified as subparts under the general VHWMR citation. Part IX of VHWMR should be referenced in place of Part X because Part IX is applicable to unpermitted units. Also, VHWMR Section 9.13, Landfills, should be included in this section of the table.