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DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT ST
NORFOLK VA 23511-2699

TELEPHONE NO:

(804) 322-4783

IN REPLY REFER TO:

5090

1822:DMF:srw

27 JUL 1995

Commonwealth of Virginia
Department of Environmental Quality
Waste Division
Attn: Ms. Erica Dameron
629 East Main Street
Richmond, Virginia 23219

Re: ARARs Coordination, Remedial Action, Site 1,
Camp Allen Landfill, Areas A and B, Naval Base,
Norfolk, Virginia; Response to Comments

Dear Ms. Dameron:

On December 7, 1994, the Navy submitted proposed ARARs for the subject project, including proposed discharge limits for the on-site wastewater treatment system. In response to this submittal, we received from the Virginia Department of Environmental Quality (VDEQ) two comment letters, dated February 3, 1995 and June 21, 1995.

The following are responses to the three comments provided in your February 3, 1995 letter;

#1 As noted in an enclosure to your June 21, 1995 letter (Paul Spaulding May 11, 1995 Memo), the subject project is being undertaken in accordance with requirements mandated by the Comprehensive Environmental Response, Compensation and Liabilities Act (CERCLA). Pursuant to CERCLA § 121(e), no Federal, State, or local permit is required for on-site removal or remedial actions undertaken under CERCLA. Substantive requirements under State programs are imposed through State approved ARARs. Thus, the substantive requirements, including monitoring, of the VPDES program are and will be complied with as noted in the Draft Final Decision Document. As a member of the Naval Base, Norfolk Restoration Advisory Board, VDEQ received this document in May 1995.

#2 The citations to the Virginia Hazardous Waste Regulations, VR 672-10-1, parts VI and VII and Regulations Governing the Transportation of Hazardous Materials, VR 672-30-1 are included in the Draft Final Decision Document.

#3 Part IX (9.13) of the Virginia Hazardous Waste Regulations has been included in the Draft Final Decision Document.

Quality Performance . . . Quality Results

Re: ARARs Coordination, Remedial Action, Site 1, Camp Allen
Landfill, Areas A and B, Naval Base, Norfolk, Virginia
Response to Comments

In response to the June 21, 1995 letter please note that the proposed wastewater treatment discharge limits were taken directly from published values. More detailed monitoring and modeling of this discharge point prior to the actual discharge could only serve to provide less stringent discharge limits than those proposed and further delay the implementation of the selected cleanup strategy. From your letter of June 2, 1995, we infer that you have accepted our proposed limits as the ARAR governing wastewater discharges, even though you believe these limits are perhaps more stringent than necessary.

If you have any questions, please contact the Remedial Project Manager, Mr. Dave Forsythe, at (804) 322-4783.

Sincerely,



N. M. JOHNSON, P.E.
Head
Installation Restoration Section
(North)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Copy to:

VDEQ (Mr. Paul Spaulding)

EPA Region III (Mr. Robert Thomson, 3HW71)

~~Administrative Record File (Naval Base Norfolk)~~

COMNAVBASE Norfolk (Code N42B, Ms. D. Bailey)

Baker Environmental (Mr. Gordan Ruggaber/Ms. Jeri Trageser)