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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

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Thomas L. Hopkins
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Becky Norton Dunlop
Secretary of Natural Resources

June 19, 1997

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Attn Mr. Randy Jackson, CODE 1822
Norfolk, Va. 23511-2699

RE: Analytical Results (Pre- Discharge) for the Camp Allen
Groundwater Treatment Plant.

Dear Mr. Jackson:

Thank you for providing the Department of Environmental Quality, (DEQ) Waste Division, the opportunity to comment on the above referenced document. Based on our review and comments received from the DEQ Tidewater Regional Office, authorization is given to discharge treated water to the Bousch Creek Culvert waterway.

This determination is based solely upon a review of the chemical data resulting from a single sampling event. Should additional data become available, this determination could possibly change. Additionally, DEQ respectfully requests that all future sampling analysis results be forwarded to this office and the Tidewater Regional Office for review and comment.

Attached are additional DEQ comments concerning these sampling results. If you have any questions, please contact me at (804) 698-4226.

Sincerely,

Devlin M. Harris
Environmental Engineer Sr.
Federal Facilities Program

cc: Tim Reisch, COMNAVBASE
Carl Thomas, DEQ TRO
Durwood Willis, DEQ

GENERAL COMMENTS

The material received at the TRO on 5/19/97 has been reviewed. Those data appear to represent the general quality of both the groundwater at several locations at the subject remediation site, and the final effluent from the existing treatment system. This treated wastewater is being discharged into an adjacent waterway leading into the Bousch Creek Culvert, thence Willoughby Bay a tributary of the Chesapeake Bay.

It is understood that this discharge proceeds under the authority of a non-VPDES permit, as part of a Superfund remediation activity. Based on a review of the data resulting from the single sampling event conducted on May 7, 1997, it appears that several substances (typically used as solvents) are being discharged from the treatment system above the effluent limitations provided along with the other chemical data. If continually met, the numeric limitations, apparently part of the non-VPDES permit addressing the specific remediation activity, should not contribute significantly to any water quality problems at the point of discharge, or at any point within the Bousch Creek Culvert waterway. This determination is based solely upon a review of the chemical data resulting from the single sampling event. Should additional data become available, this determination could possibly change.

At this time, it does not appear that this non-VPDES discharge will necessitate the immediate reopening or modification of VPDES Permit No. VA0004421, issued to the Norfolk Naval Base. This document identifies both ends of the Bousch Creek Culvert, with several of the Base's discharges into the culvert being independently monitored.

It is expected that when VA0004421 is reissued (5/12/2000), areas within control of COMNAVBASE Norfolk not previously addressed by the permit, will be incorporated at that time. This action would include the area bounded by I-564, Terminal Boulevard and Hampton Boulevard. This general area includes the Camp Allen Landfill and the non-VPDES permitted discharge from the subject remediation activity.

By law, the permit application for reissuance of VPDES Permit No. VA0004421 is due at this office by not later than 180 days prior to the expiration of the current permit. Knowing the client, an application pre-meeting will be scheduled well before any critical due dates. This and other issues should be raised at that time for further actions.

It should be recommended to the contractor of the landfill's treatment unit that the PQL for analyses for the solvents should be at or below the proposed permit limits for the same constituents. The data reviewed were reported above the limits, but at a concentration below the MDL/PQL (?).

If there are any questions, or if we can be of further assistance, please feel free to contact this office (757) 518-2000. Regards.