

7/24/95 - 01835



Baker Environmental, Inc.
420 Rouser Road
Airport Office Park Bldg. 3
Coraopolis, PA 15108
Telephone: (412) 269-6000
Fax: (412) 269-2002

Letter of Transmittal

To: Commander-Atlantic Division
Lafayette River Annex-Bldg. A
6500 Hampton Blvd.
Norfolk, Virginia 23508

S.O. No. 62470-084-SRN
Project: Camp Allen Landfill
Date: July 24, 1995

Attn: Mr. David M. Forsythe, P.E.

We are forwarding the following: Attached Under Separate Cover

DWG. NO.	NO. COPIES	TITLE OR DESCRIPTION	COMMENTS
	1	ATTACHMENT A - Response to VDEQ comments received on Draft Final Decision Document.	
	1	ATTACHMENT A - Response to COMNAVBASE comments received on Draft Final Decision Document.	

THESE ARE TRANSMITTED as checked below:

- As requested
- For review and comment
- For your information
- No exceptions taken
- Rejected - See remarks
- Proceed subject to corrections noted
- Revise and resubmit
- Submit specified items
- _____

GENERAL COMMENTS:

BAKER ENVIRONMENTAL, INC.

By: Jeri Trageser, P.G.

Title: Project Manager

Page 1 of 1

ATTACHMENT A

RESPONSE TO COMNAVBASE COMMENTS on DRAFT FINAL DECISION DOCUMENT CAMP ALLEN LANDFILL, NAVAL BASE, NORFOLK, VIRGINIA

Comments received from Dianne Bailey (July 5, 1995)

1. *Page 1-1, 3rd paragraph, 3rd sentence. Remove comma and change verb to were. "Area A... and a helipad which were built..."*

Response: Text has been amended as noted above.

2. *Page 5-2 and 7-9. Have we re-sampled the pond area to see if the level of contamination has decreased as a result of the removal action? Or will this be part of the monitoring for the remedial action of the entire area?*

Response: Re-sampling of surface water and sediment in the Area B pond has been included as part of the Post-Remediation Ecological Monitoring Program. Text which describes this post-remediation sampling has been added to Section 6 of the Final Decision Document.

3. *Table 6-1 Toxicity Factors*
 - a. *What does "WOE" stand for? There is no written description in Section 6.1.3 - Toxicity Assessment (page 6-3).*
 - b. *The Notes section needs to include explanations of "CSF", RfD" and "WOE" for easier reference.*
 - c. *Letters under the "WOE" column - What do these represent? They should also be in the "Notes" section and/or explained in the text in Section 6.1.3.*

Response:

- a. "WOE" - weight of evidence. Section 6.1.3 has been amended accordingly.
- b. Footnotes have been added to the tables which describe each abbreviation.
- c. Footnotes have been added to the tables which describe the USEPA weight-of-evidence classifications: (A) carcinogen; (B) probable carcinogen; (C) possible carcinogen; and (D) not classified.

4. *Page 7-2, 1st paragraph, last sentence. Camp Allen is just a name of a place on the Naval base, it is not an operating activity. Camp Allen, by itself, can not be closed due to BRAC. Naval Base, Norfolk would be the activity to close. Change sentence to "There are currently no plans to close Naval Base, Norfolk or the Camp Allen area; however, in the event of base closure..."*

ATTACHMENT A (continued)

RESPONSE TO COMNAVBASE COMMENTS on
DRAFT FINAL DECISION DOCUMENT
CAMP ALLEN LANDFILL, NAVAL BASE, NORFOLK, VIRGINIA

Response: Text has been amended as noted above.

5. *Page 7-5, 2nd paragraph, 6th sentence. "It is estimated that the ..."*

Response: Text has been amended.

6. *Page 7-13 - Alternative A1-GW2. See comment #4.*

7. *Page 7-17 - Alternative A2-GW2. See comment #4.*

8. *Page 7-22 - Alternative B-GW2. See comment #4.*

Response to Comments 6, 7, and 8: Text has been amended as noted in comment #4.

9. *Page 10-3, Section 10.2 Compliance with ARARs, 1st paragraph, 2nd sentence. Change to "No ARAR waivers are anticipated."*

Response: Text has been amended as noted above.

10. *Page 10-3, Same section as above, 2nd paragraph, 1st sentence. Capitalize "Maximum Contaminant Levels (Federal MCLs)" and 2nd sentence - "are risk-based levels for nonpotable use."*

Response: Text has been amended as noted above.

11. *Page 10-5, 2nd paragraph, 3rd sentence. "...can be implemented at a much lower cost than groundwater extraction and treatment..."*

Response: Text has been amended as noted above.

12. *Page 10-5, 3rd paragraph. There was one comment from the RAB meeting from a "community" representative. Can we use this as a community question, so it looks like we got at least one comment?*

Response: Text has been amended to refer to the RAB member question as "one comment was received from the community".

13. *Page 10-5, Section 10.5, 1st paragraph, 1st sentence. Treatment, the selected remedy at the site, addresses the principal threats posed by both groundwater and soil contamination."*

ATTACHMENT A (continued)

**RESPONSE TO COMNAVBASE COMMENTS on
DRAFT FINAL DECISION DOCUMENT
CAMP ALLEN LANDFILL, NAVAL BASE, NORFOLK, VIRGINIA**

Response: Text has been amended as noted above.

14. *Table 10-1, Executive Order 11988. Under column heading "Requirement". "Activities located in a floodplain must comply with this Executive Order."*

Response: Table has been amended as noted above.

Comment received from Cheryl Barnett (July 12, 1995)

1. *There appears to be a discrepancy between chemical concentrations noted in figures and tables in Section 5.0 of the decision document, please explain. (Comment is paraphrased based on a conversation with Ms. Dianne Bailey on July 12, 1995 who relayed Ms. Barnett's comment to the Baker Project Manager.)*

Response: Figures in Section 5.0 reflect analytical results from the October 1993 (Round 3) Pre-Design sampling effort which is described in the text. Tables present COPC's selected based on information obtained during Rounds 2 and 3 and also show maximum concentrations from those two sampling rounds. Therefore, some of the concentrations noted in the tables will not correlate with the concentrations presented in the figures in this section. To eliminate any possible future confusion, a footnote has been added as appropriate to indicate from what sampling rounds the data were obtained.