

1/11/06 - 01569



COMMONWEALTH of VIRGINIA

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

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January 11, 2006

Winoma Johnson
Remedial Project Manager
Naval Facilities Engineering Command, Mid-Atlantic
9742 Maryland Avenue
Code EV3, Bldg N-26, Room 3208
Norfolk, VA 23511-3095

Re: **Draft Engineering Evaluation/Cost Analysis; Site 23 – Building LP-20 Plating Shop;
Naval Station Norfolk, Norfolk, VA**

Dear Ms. Johnson:

Thank you for the opportunity to comment on the *Draft Engineering Evaluation/Cost Analysis; Site 23 – Building LP-20 Plating Shop (Draft EE/CA)* submitted November 18, 2005 by your consultant, Ms. Holly Rosnick with CH2M Hill, Inc. The Department of Environmental Quality's Office of Remediation Programs (the Department) has completed its review and comments concerning the *Draft EE/CA* are attached.

If you have questions concerning any of the above, please contact me at (804) 698-4131 or you may e-mail me at gweng@deq.virginia.gov.

Sincerely,

A handwritten signature in blue ink that reads "Garwin W. Eng".

Garwin W. Eng
Environmental Engineer Senior
ORP, FFR

Attachment

c: Todd M. Richardson – EPA Region III (3HS11)
Milton L. Johnston – TRO, DEQ
Durwood H. Willis – DEQ
Erica S. Dameron – DEQ
Naval Station Norfolk Correspondence File

Draft Engineering Evaluation/Cost Analysis; Site 23 – Building LP-20 Plating Shop
Naval Station Norfolk, Norfolk, VA
Virginia Department of Environmental Quality Comments

Comments are referenced in accordance with the *Draft EE/CA* by section, paragraph (counting from the beginning of the section), sentence (counting from the beginning of the paragraph), and page number.

RPM Comments

1. 2.5.2, Step 1, 1st sentence, page 2-11 – The most current EPA Region III RBCs Table is dated October 26, 2005. Please revise accordingly throughout *Draft EE/CA*.
2. 3.5, page 3-4 – The contaminants at this site include various listed plating- and spent solvent-related hazardous wastes. Therefore, any contaminated media and debris from this site should also be assumed to be listed hazardous wastes (until decontaminated or delisted). Please revise accordingly throughout the *Draft EE/CA*.
3. 4.1.2, paragraph 2, pages 4-1 through 4-2 – This indicates that the brick tiles covering the floor will be removed to in order to provide a solid foundation for the GFRC slab. Please specify whether or not this includes the brick tiles on the walls and floors of the pits.
4. 4.1.3, paragraph 2, 1st sentence, page 4-2 – TCLP will not be sufficient to completely characterize wastes removed from this site. Waste characterization parameters must include total (as opposed to leachable) inorganics and organics. A list of specific constituents may be found in the RCRA closure plans for the site.
5. 4.1.3, paragraph 2, last sentence, page 4-2 – Any contaminated media and debris should be assumed to be listed hazardous wastes. (Also see comment 2 above.)
6. 4.2.2, page 4-3 – The description of Alternative #2 provided here appears to contradict that provided in section 4.1.2. Please specify whether or not the brick tiles (from the floor as well as the walls and floors of the pits) will be removed.
7. 4.2.2, 2nd sentence, page 4-3 – This states that debris in the pits (described as bricks, scrap metal, scrap wood, loose soil, and sand in section 3.2) would remain in place. Covering wastes in place would require LTM of groundwater for the constituents specific to this site (see comment 4 above). Also, the contaminated debris in the pits may not be able to provide a solid foundation for the GFRC slab (see comment 3 above).
8. Table C-1, Assumptions, item 1, page 1 of 3 – Please revise this to indicate disposal at a subtitle C landfill. (Also see comment 2 above.)
9. Table C-1, Assumptions, page 1 of 3 – Item 5 appears to be missing. Please correct this error.

ARARs Comments

10. General Comment – Sections 300.415(m) and 300.820 of the NCP specify community relations and administrative record activities as two forms of public participation necessary for all removal actions. Please include in the Executive Summary how these requirements are being met.
11. Section 1.1, page 1-1 – As mentioned in the 4th paragraph, this removal action is being considered for Site 23, “where soils in the process pits in the floor of Building LP-20 are impacted by polyaromatic hydrocarbons (PAHs), arsenic, cadmium, chromium, lead, and nickel from past metal plating activities.” Please note that remediation wastes are subject to RCRA Subtitle C if they are listed or identified as hazardous waste. Since the primary source of contamination is associated with the metal plating operations, these remediation wastes would be considered a listed hazardous waste. Only if the source of contamination, contaminant, or waste is unavailable or inconclusive, EPA has stated that one may assume the source, contaminant or waste is not a listed waste.
12. Section 5, pages 5-1 through 5-3 – Please provide a detailed analysis summarizing which requirements are applicable or relevant and appropriate to an alternative and describing how the alternative meets those requirements. As potential actions are evaluated, identify potential action-specific ARARs and determine how compliance with ARARs would impact cost and duration of action potentially requiring and exemption. If the action plan is modified as a result of comments or other circumstances, identify new ARARs and reevaluate practicability of ARARs compliance.
13. Appendix B, Table B-2, Virginia Hazardous Waste Management Regulations – Please see the note above and correct the comment section on the “Definition of Hazardous Waste.”
14. Appendix B, Table B-2, Virginia Solid Waste Management Regulations – The Virginia Solid Waste Management Regulations are applicable.
15. Appendix B, Table B-2 – Since the EE/CA is not addressing groundwater, all citations to groundwater should be removed.
16. Appendix B, Table B-4 – Please remove the statements that begin “This requirement is not an ARAR since...” from the **Comment** columns. The second statements in the **Comment** are sufficient.
17. Appendix B, Table B-4 – Virginia Hazardous Waste Management Regulations are applicable (see comment 11 above).