

11/3/04-00270

Capito, Bonnie P CIV NAVFAC Lant

From: Garth, David S NAVFAC Lant
Sent: Wednesday, November 03, 2004 8:41 AM
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: FW: Site 3 Draft PRAP For Your Review



Site 3 PRAP
Comments.doc

For the admin record.

thanks,

D. Stephen Garth
Naval Facilities Engineering Command
Atlantic Division Headquarters
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__--_Original Message-----

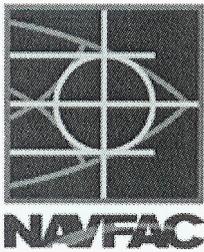
From: Richardson.Todd@epamail.epa.gov
[mailto:Richardson.Todd@epamail.epa.gov]
Sent: Tuesday, November 02, 2004 16:30
To: Garth, David S NAVFAC Lant
Cc: Friedmann, William/VBO; Kimberly.Henderson@CH2M.com
Subject: Re: Site 3 Draft PRAP For Your Review

(See attached file: Site 3 PRAP Comments.doc)

Hello people,

Attached are EPA comments on the Site 3 PRAP. I went ahead and incorporated changes into the document, please let me know if any clarification is needed. Also, Betsey (the attorney) had a few additional concerns - I think we can easily resolve with a little word-smithing. I will try to catch up with either Bill or Kim tomorrow to address outstanding issues - (give me call if you don't hear from me by noon or so).

Thanks Guys . . . and Mrs. Henderson (must maintain the proper level of respect, I see what happened to Mr. Henderson;-)
Talk to you soon,
Todd



Proposed Remedial Action Plan

Site 3: Waste Disposal Area C

St. Juliens Creek Annex
Chesapeake, Virginia

SEPTEMBER 2004

1 Introduction

This **Proposed Remedial Action Plan** identifies the Preferred Alternative for addressing potential contamination at **Site 3**, Waste Disposal Area C (formerly called Landfill C), at St. Juliens Creek Annex (SJCA), and provides the rationale for this preference. The U.S. Navy (Navy) proposes no further remedial action at Site 3, based on current site conditions.

This document is issued by the Navy, the lead agency for site activities, and the U.S. Environmental Protection Agency (**EPA**) Region III, in consultation with the Virginia Department of Environmental Quality (**VDEQ**), the support agencies. The Navy and EPA, in consultation with the VDEQ, ~~and with the concurrence of EPA,~~ will make the final decision on the remedial approach for Site 3 after reviewing and considering all information submitted during the 30-day **public comment period**. The Navy and EPA, in consultation with VDEQ, may modify the Preferred Alternative or select another **remedial action** based on new information or public comments. Therefore, public comment on the Preferred Alternative is invited and encouraged. Information on how to participate in this decisionmaking process is presented below and in Section 7.

The Navy is issuing this Proposed Remedial Action Plan as part of its public participation responsibilities under Comprehensive Environmental Response, Compensation, and Liability Act (**CERCLA**) and Section 300.430(f)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (**NCP**). This Proposed Remedial Action Plan summarizes information that can be found in greater detail in the Remedial Investigation/Human Health Risk Assessment/Ecological Risk Assessment (**RI/HHRA/ERA**) Report for Sites 3, 4, 5, and 6 (CH2M HILL, March 2003), the Final Site 3 Confirmation and Closeout Report (CH2M HILL, August 2004), the Final Engineering Evaluation/Cost Analysis (**EE/CA**) for Sites 3 & 6 (CH2M HILL, June 2002), and other documents contained in the **Administrative Record** file and Information Repository for SJCA (see Section 7). This plan summarizes the following:

- Site background and previous investigations (Section 2)
- Site characteristics (Section 3)
- Scope and role of response action (Section 4)
- Site risks (Section 5)
- Preferred Alternative rationale (Section 6)
- Opportunities for public participation (Section 7)

Mark Your Calendar for the Public Comment Period

Public Comment Period

Add revised date

~~October 20, 2004~~

Attend the Public Meeting

Add revised date ~~October 1 - November 1, 2004~~

Submit Written Comments

The Navy, EPA, and VDEQ will accept written comments on the Proposed Remedial Action Plan during the public comment period. To submit comments or obtain further information, please refer to the insert page.

Time - 5:00 pm

Place - Major Hillard Library

824 Old George Washington Hwy N

Chesapeake, Virginia 23323

The Navy will hold a public meeting to explain the Proposed Remedial Action Plan. Verbal and written comments will be accepted at this meeting.

Location of Information Repository

Major Hillard Library

824 Old George Washington Hwy N

Chesapeake, VA 23323

Phone: (757) 382-3600

A glossary, defining terms used in this document (identified by bold text), is also included.

2 Site Background

2.1 Site Description and Background

The SJCA facility is situated at the confluence of St. Juliens Creek and the Southern Branch of the Elizabeth River in the City of Chesapeake in southeastern Virginia (Figure 1). The facility covers approximately 490 acres and includes administrative buildings, wharf areas on the Southern Branch of the Elizabeth River, a central heating plant, numerous non-operational industrial facilities, and miscellaneous structures. SJCA was placed on EPA's National Priorities List (**NPL**) in August 2000.

Site 3 is one of several Installation Restoration Program (IRP) sites being addressed under CERCLA at SJCA. Site 3 covers approximately 2.1 acres in the northeast portion of SJCA (Figure 2). In earlier documents, Site 3 was referred to as "Dump C" and the aerial extent was initially reported to be 10 acres. The disposal history at Site 3 is based on information provided in the previous investigations listed in Section 2.2.

Review of historical aerial photographs indicated that before 1940, the site and much of the adjacent area was used for placement of dredge spoil material. Refuse disposal operations began in 1940 and continued until 1970, before the implementation of the Resource Conservation and Recovery Act (RCRA). The Site 3 disposal area was originally a mudflat where refuse was dumped, ~~allowed to burn~~ burned, and the ash was used to reclaim the low-lying area. Burned refuse was extinguished daily using water from a fire hose. Salvageable materials were removed from the site daily, and every 2 weeks the site was bulldozed for compaction and leveling. Refuse dumped at Site 3 included solvents, acids, bases, and mixed municipal waste. The total volume of waste disposed of was estimated to be approximately 750,000 cubic feet (27,800 cubic yards) before burning. Two pits at Site 3 were reportedly used for the disposal of oil and oily sludge and for periodic burning. The disposal pits were located along the north side of the access road that diagonally crosses the site. After 1970, the area was graded level and covered with grass.

Findings of a waste delineation investigation and interviews with former SJCA employees, conducted in 2001, revealed that the extent of waste at Site 3 was smaller than reported and that the site was not an established landfill area. As a result, the SJCA Partnering Team reclassified the site as a waste disposal area.

2.2 Summary of Previous Investigations

Initial Assessment Study (1981)

In 1981, the Navy conducted the Initial Assessment Study (IAS) as part of the Naval Assessment and Control of Installation Pollutants (NACIP) Program. The purpose was to qualitatively identify and assess sites that posed a potential threat to human health or the environment as a result of contamination from past handling of (and operations involving) hazardous materials. The IAS determined that Dump C (Site 3), did not pose a threat to human health and the environment, and no confirmation study was recommended.

Preliminary Assessment (1983)

In 1983, NUS conducted a Preliminary Assessment (PA). Air samples were monitored for volatile organics and radiation; no readings above background were encountered at Site 3.

Phase II RCRA Facility Assessment (1989)

In 1989, A.T. Kearney, Inc. and K.W. Brown and Associates, Inc. prepared the RCRA Facility Assessment (RFA). The RFA included a preliminary review of all available relevant documents and a visual site inspection of 34 Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), including Dump C (Site 3). No sampling was conducted during the RFA. Dump C (Site 3) was recommended for a RCRA Facility Investigation (RFI) due to the high potential for releases to site media (soil, groundwater, and surface water).

Relative Risk Ranking System Data Collection Report (1996)

In April 1996, CH2M HILL submitted a Relative Risk Ranking (RRR) System Data Collection Report for SJCA. The report contained results from sampling at 21 sites, including Site 3, where data had not been previously available. The sampling effort's goal was to gather data for the Navy to perform assessments of the sites in order to rank and prioritize them based on level of risk.

Two surface soil and three groundwater samples were collected from Site 3. Several pesticides, polychlorinated biphenyls (PCBs), and polycyclic aromatic hydrocarbons (PAHs) were detected in the

surface soil samples. Explosives, semivolatile organic compounds (SVOCs), and inorganics were detected in the groundwater samples. Analytical results were not validated.

Remedial Investigation/Human Health Risk Assessment/Ecological Risk Assessment Report (1997 through 2003)

An RI/HHRA/ERA Report was completed by CH2M HILL in March 2003 to define the nature and extent of soil, groundwater, sediment, and surface water contamination, evaluate the geologic and hydrogeologic systems at the site to further understand contaminant distribution and potential migration pathways, and determine if Site 3 poses unacceptable risks to human health and the environment.

Waste debris and burnt/stained soils were visually identified within 30 inches of the ground surface at Site 3. In soils, elevated chemical concentrations (primarily inorganics, PAHs, and dioxins), reflective of potential impacts from Site 3 activities, were identified within the waste area and site drainages. One surface soil hot spot (SS15) was present outside the limits of waste. Potential human health risk drivers for soil (surface and subsurface soil combined) were arsenic and iron. The ecological risk drivers found in surface soil above **background concentrations** were the inorganics antimony, chromium, copper, iron, lead, vanadium, and zinc; several pesticides; and PAHs. The PAHs were identified as risk drivers based on only one elevated location within the waste area. The pesticides DDD and endosulfan sulfate were identified as risk drivers based on only one elevated location each from within the waste area. Additionally, based on only slight exceedances of the background, the SJCA Partnering Team determined the potential risk posed by vanadium to be acceptable. Primary fate and **contaminant migration pathways** at Site 3 include surface runoff and erosion of soil to the drainage ditches at Site 3 and infiltration and leaching of precipitation through the vadose zone from soil to the groundwater system.

No human health risk drivers were identified for the shallow (Columbia Aquifer) groundwater and risks identified in the deeper (Yorktown Aquifer) groundwater are determined to be acceptable based on the generally low concentrations of compounds, the low risks identified with these compounds, and the nature of the groundwaterflow conditions.

The inorganics antimony, arsenic, and iron were identified as human health risk drivers in upland drainage ditch sediment. The upland drainage ditches constructed near the site to control runoff are comprised of the same soil type as the site soils (dredge fill), remain dry through the majority of the year, are vegetated with grass, and contain no viable aquatic habitat. Therefore, background for dredge fill soils were used to identify site-related releases. Further evaluation of the potential for adverse effects to aquatic life in Blows Creek sediment was recommended based on elevated chemical concentrations of the inorganics arsenic, barium, cobalt, copper, cyanide, lead, manganese, nickel, and zinc and the pesticides DDD and DDE. A separate Baseline Ecological Risk Assessment (BERA) for Blows Creek is currently being conducted to identify potential risk associated with possible historical contributions to Blows Creek from upland Navy IRP sites, including Site 3. Because surface water is transient at Site 3 and the upland drainage ditches provide minimal ecological habitat, there were no significant risks to the environment identified from direct exposure to surface water.

The RI/HHRA/ERA recommended a removal action for Site 3; including waste, soil, and upland drainage ditch sediment; to mitigate risks and eliminate concern for continued transport of potential contaminants to Blows Creek via the site-related drainage ditches.

Engineering Evaluation/Cost Analysis and Action Memorandum (2002)

Based on the draft findings of the RI/HHRA/ERA, CH2M HILL conducted an EE/CA to identify and analyze remedies or removal actions to mitigate potential risk at Site 3. Three alternatives were identified, evaluated, and ranked. Based on the comparative analyses of the removal alternatives, the selected non-time-critical removal action (**NTCRA**) involved excavation, disposal characterization (including unexploded ordnance [UXO] oversight), and disposal of waste, soil, and upland drainage ditch sediment at Site 3. The volume of the material and soil to be removed was estimated to be 9,204 cubic yards. Confirmatory samples were to be collected from the remaining soils at the sides and bottom of the excavated areas to verify that cleanup goals were met. The Draft EE/CA was made available to the public for comment on May 14, 2002. No comments were received from the public during the comment period, which ended June 14, 2002. The Navy signed an Action Memorandum in 2002 to implement the Selected Remedy as specified in the EE/CA.

Site 3 Removal Action (2002 through 2004)

The NTCRA activities at Site 3 were conducted in two phases. Phase I was conducted by the Navy's Remedial Action Construction (RAC) Contractor OHM/SHAW from August 2002 through September 2002. CH2M HILL performed confirmatory sampling and provided guidance on the extent of the Phase I removal. During Phase I, approximately 3,300 cubic yards of waste and soil were removed from the northern portion of Site 3. The limits of excavation (Figure 2) were determined based on achieving soil

field screening results below background for dredge fill soils followed by off-site laboratory confirmation analyses.

In February 2003, CH2M HILL conducted a waste delineation investigation to delineate the remaining waste, soil, and upland drainage ditch sediment requiring excavation at Site 3 by obtaining confirmation samples. The Phase II removal was conducted by AGVIQ-CH2M HILL Joint Venture I (JV I) from October 2003 through March 2004. Approximately 9,497 cubic yards of waste, soil, and upland drainage ditch sediment were removed based on the confirmatory sample results (Figure 2).

The Confirmation Closeout Report, completed in August 2004, summarizes the confirmation sample results from the NTCRAs conducted at Site 3. The confirmation sample results show that the average concentrations for all compounds of potential concern were below background concentrations, and the central-tendency population-to-population comparisons indicated no statistical difference between site and background data. Therefore, the potential risk to human and ecological receptors posed by Site 3 has been mitigated by the removal actions conducted. Based upon the complete removal of waste, soil (including the area of the former disposal pits), and upland drainage ditch sediment that posed a potential risk at Site 3, the SJCA Partnering Team reached consensus for closure of Site 3.

3 Site Characteristics

Site 3 covers an estimated 2.1 acres and is an open grass-covered area east of Cradock Street in the facility's northern portion (Figure 1). The site's topography is relatively flat with a land surface elevation of approximately 10 to 15 feet above mean sea level. The site is bordered to the north by the Norfolk and Western Railroad, to the south by IRP Site 4 (Landfill D), to the west by IRP Site 5 (Burning Grounds), and to the east by a former industrial waste pond. Site 3 was occasionally used as part the base's radar testing operations. Buildings 458 and 1459, located east of the site constitute the radar tower and control building used during radar testing operations (Figure 2). The grass is regularly mowed and the adjacent patrol road is accessible and occasionally utilized as an exercise path by base personnel.

Along the north, east, and west sides of Site 3, drainage ditches divert stormwater from the site southward to Blows Creek. Groundwater at the site ranges seasonally between 2 and 8 feet below ground surface and flows toward nearby surficial water bodies (i.e., Blows Creek to the south and the Southern Branch of the Elizabeth River to the east).

4 Scope and Role of Response Action

There are no principal threats posed by Site 3. The removal of waste, soil, and upland drainage ditch sediment at Site 3 was completed in March 2004. Based on current site conditions, no further remedial action is proposed at Site 3. Therefore, no remedial action objectives (**RAOs**) were developed and no remedial alternatives were considered.

5 Summary of Site Risks

The potential risks to human and ecological **receptors** at Site 3 were mitigated by the complete removal of waste, soil, and upland drainage ditch sediment. A detailed discussion of risk previously found at Site 3 can be found in the RI/HHRA/ERA (CH2M HILL, March 2003) and, subsequent to the NTCRAs, in the Confirmation Closeout Report (CH2M HILL, August 2004).

6 Preferred Alternative

As a result of the NTCRAs completed at Site 3 in March 2004, there is no unacceptable risk to human health or the environment at the site, allowing for unlimited use and unrestricted exposure. Therefore, remedial measures at Site 3 are no longer appropriate and the ~~no~~ **No Further Action** alternative is the only remedial alternative considered. Hence, the Navy recommends No Further Action as the Preferred Alternative for Site 3. The estimated cost to implement this alternative is \$0.

The Navy, VDEQ, and EPA support the Preferred Alternative. However, their final concurrence with the alternative will be provided following review of all comments received during the public comment period. The Preferred Alternative could change based on public comments.

Based on information currently available, the lead agency believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs with respect to the **nine evaluation criteria**. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with Applicable or Relevant and Appropriate Requirements (**ARARs**); 3) be cost-effective; 4) utilize permanent solutions and alternative treatment technologies to the maximum extent practicable; and 5) satisfy the preference for treatment as a principle element (or justify not meeting the preference).

7 Community Participation

A community relations program is being conducted at SJCA through the IRP. Public input is a key element in the decisionmaking process. The SJCA Restoration Advisory Board (RAB) was formed in **1999** to provide an information exchange among community members, the EPA, the Commonwealth of Virginia, and the Navy. RAB meetings are held periodically and are open to the public.

This Proposed Remedial Action Plan fulfills the public participation requirements of CERCLA Section 117(a), which specifies that the lead agency (i.e., the Navy) must publish a plan outlining any remedial alternatives evaluated for the site and identifying the Preferred Alternative. All documents referenced in this Proposed Remedial Action Plan are available for public review as part of the Administrative Record and at the information repository.

The public comment period for the Proposed Remedial Action Plan provides an opportunity to provide input regarding the proposed No Further Action remedy source control and risk reduction process for Site 3. The public comment period will be from October 1, 2004 to November 1, 2004, and a public meeting will be held on October 20, 2004 at 5:00 pm (see Page 1 of this report for details). All interested parties are encouraged to attend the meeting to learn more about Site 3. The meeting will provide an additional opportunity to submit comments on the Proposed Remedial Action Plan to the Navy.

The insert page may be used to provide comments to the Navy, although the use of this form is not required. Comments must be postmarked no later than November 1, 2004. On the basis of comments or new information, the Navy may modify the Preferred Alternative or choose another alternative. The Navy will summarize and respond to comments in a responsiveness summary, which will become part of the official Record of Decision (**ROD**). After the public comment period, the Navy, in consultation with the EPA and VDEQ, will determine whether the Proposed Remedial Action Plan should be modified on the basis of comments received. Any required modifications will be made by the Navy and reviewed by the EPA and VDEQ. If the modifications substantially change the proposed remedy, additional public comment may be solicited. If not, then the EPA and Navy will prepare and sign the ROD,

During the comment period, interested parties may submit written comments to the following addresses:

Mr. Robert Schirmer, Code EV22-RGS

NAVFAC - Atlantic
6506 Hampton Blvd.
Norfolk, VA 23508-1278
(757) 322-4145
Fax - (757) 322-4805

Mr. Todd Richardson, Code 3HS13

US EPA (Region III)
1650 Arch Street
Philadelphia, PA 19103
(215) 814-5264
Fax - (215) 814-3051

Ms. Debra Miller

Virginia Dept. of Environmental Quality
629 East Main Street
Richmond, VA 23219
(804) 698-4206
Fax - (804) 698-4234

Locations of Administrative Record

The Community Relations Plan for SJCA, IRP fact sheets, and final technical reports concerning Site 3 are available to the public at the following locations:

Naval Facilities Engineering Command - Atlantic

Attention: John Peters, Public Affairs Officer
6506 Hampton Blvd.
Norfolk, VA 23508-1278
(757) 322-8005

Major Hillard Library

824 Old George Washington Hwy N
Chesapeake, VA 23323
(757) 382-3600

detailing the remedial action chosen for the site.

Glossary

Administrative Record: Site information is compiled in an Administrative Record and placed in the general IRP information repository for public review.

ARARs: Applicable or Relevant and Appropriate Requirements. These are Federal or State environmental rules and regulations.

Background Concentrations: The concentration of a naturally occurring or manmade constituent, such as a metal, found in groundwater, soil, sediment, and surface water in areas not impacted by spills, releases, or other site-specific activities. Background concentrations of some metals and other constituents are often at levels that may pose a risk to human health or the environment. These background-related risks should be considered (i.e.: subtracted) when calculating the risk posed by site conditions.

CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act. A Federal law, commonly referred to as the "Superfund" Program, passed in 1980 that provides for cleanup and emergency response in connection with numerous existing inactive hazardous waste disposal sites that endanger public health and safety or the environment.

Contaminant Migration Pathways: The routes that site contaminants may take to get from the source of contamination to a human being, animal, or plant.

EE/CA: Engineering evaluation/cost analysis. For a NTCRA, an EE/CA is prepared rather than a more extensive FS. An EE/CA focuses only on the substances to be removed rather than on all contaminated substances at the site.

EPA: United States Environmental Protection Agency. The Federal agency responsible for administration and enforcement of CERCLA (and other environmental statutes and regulations), and with final approval authority for the selected ROD remedy.

ERA: Ecological Risk Assessment. An evaluation of the risk posed to the environment if remedial activities are not performed at the site.

Groundwater: Subsurface water that occurs in soils and geologic formations that are fully saturated.

HHRA: Human Health Risk Assessment. An evaluation of the risk posed to human health should remedial activities not be implemented.

IRP: Installation Restoration Program. The Navy, as the lead agency, acts in partnership with EPA and VDEQ to address environmental investigations at the facility through the IRP. The current IRP is consistent with CERCLA and applicable state environmental laws.

Media (singular, Medium): Soil, groundwater, surface water, or sediments at the site.

NCP: National Oil and Hazardous Substances Pollution Contingency Plan. Provides the organizational structure and procedures for preparing for and responding to discharges of oil and releases of hazardous substances, pollutants, and contaminants.

Nine Evaluation Criteria:

- **Overall Protection of Human Health and the Environment** - Addresses whether a remedy provides adequate protection and describes how risks posed through each pathway are eliminated, reduced, or controlled through treatment, engineering controls, or institutional controls.
- **Compliance with ARARs** - Addresses whether a remedy will meet all of the ARARs of other Federal and State environmental laws and/or justifies a waiver of the requirements.
- **Long-Term Effectiveness and Permanence** - Addresses the expected residual risk and the ability of a remedy to maintain reliable protection of human health and the environment over time, once clean-up goals have been met.
- **Reduction of Toxicity, Mobility, and Volume Through Treatment** - Discusses the anticipated performance of the treatment technologies a remedy may employ.
- **Short-Term Effectiveness** - Considers the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period, until clean-up goals are achieved.

- **Implementability** - Evaluates the technical and administrative feasibility of a remedy, including the availability of materials and services needed to implement an option.
- **Cost** - Compares the estimated capital, operations and maintenance and present worth costs.
- **State Acceptance** - Considers the State support agency comments on the Proposed Remedial Action Plan.
- **Community Acceptance** - Provides the public's general response to the alternatives described in the Proposed Remedial Action Plan, RI, and FS Reports. The specific responses to the public comments are addressed in the Responsiveness Summary section of the ROD.

NPL: National Priorities List. A list, developed by EPA, of uncontrolled hazardous substance release sites in the United States that are considered priorities for long-term remedial evaluation and response.

NTCRA: Non-time-critical removal action. Removal actions that may be delayed for 6 months or more without significant additional harm to human health or the environment are classified as NTCRA.

Proposed Remedial Action Plan: A document that presents and requests public input regarding the proposed cleanup alternative.

Public Comment Period: The time allowed for the members of an affected community to express views and concerns regarding an action proposed to be taken by the Navy and EPA, such as a rulemaking, permit, or Superfund-remedy selection.

RAOs: Remedial Action Objectives. Objectives of remedial actions that are developed based on contaminated media, contaminants of concern, potential receptors and exposure scenarios, human health and ecological risk assessment, and attainment of regulatory cleanup levels, if any exist.

RCRA: Resource Conservation and Recovery Act. A Federal law, passed in 1976 that ensures that wastes are managed in a manner that protects human health and the environment, reduce or eliminate the amount of waste generated, and conserve energy and natural resources through waste recycling and recovery.

Receptors: Humans, animals, or plants that may be exposed to risks from contaminants related to a given site.

Remedial Action: A cleanup method proposed or selected to address contaminants at a site.

RI: Remedial Investigation. A study of a facility that supports the selection of a remedy where hazardous substances have been disposed or released. The RI identifies the nature and extent of contamination at the facility.

ROD: Record of Decision. A legal document that describes the cleanup action or remedy selected for a site, the basis for choosing that remedy, and public comment on the considered selected remedy.

Site: The area of the facility where a hazardous substance, hazardous waste, hazardous constituent, pollutant, or contaminant from the facility has been deposited, stored, disposed of, placed; has migrated; or otherwise come to be located.

VDEQ: Virginia Department of Environmental Quality. The Commonwealth agency responsible for administration and enforcement of environmental regulations.

Place
stamp
here

Mr. Robert Schirmer, Code EV-22RGS
NAVFAC - Atlantic
6506 Hampton Blvd.
Norfolk, Virginia 23508-1278