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U S NAVY RESPONDS TO U S EPA COMMENTS TO DRAFT VARIANCES FROM PLANNED
APPROACH FOR REMEDIAL SYSTEM OPERATION AND MAINTENANCE RE-INJECTION
SITE 12 NAB LITTLE CREEK VA
2/14/2012
CH2M HILL



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February 14, 2012

NPL/BRAC Federal Facilities Branch (3HS11)
Office of Federal Facility Remediation and Assessment
USEPA Region III
Attn: Mr. Jeffrey M. Boylan
1650 Arch Street
Philadelphia, PA 19103

Subject: Response to USEPA Comments on *Draft Variances from Planned Approach, Remedial System Operation and Maintenance Re-Injection, Site 12, Joint Expeditionary Base (JEB) Little Creek-Fort Story, JEB Little Creek, Virginia Beach, Virginia*
Navy CLEAN 1000, Contract N62470-08-D-1000, Task Order 0066

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments received February 9, 2012, from USEPA on *Draft Variances from Planned Approach, Remedial System Operation and Maintenance Re-Injection, Site 12, Joint Expeditionary Base (JEB) Little Creek-Fort Story, JEB Little Creek, Virginia Beach, Virginia* (CH2M HILL, December 2011):

Comment 1, Injection Approach and Variances, Paragraph 1, 1st sentence: Referred to as SRS-B in the Project Instructions.

Response: Acronym "SRS-B" added to text.

Comment 2, Injection Approach and Variances, Paragraph 1, 4th sentence: Project Instructions called for a 60:1 ratio. Please include a sentence to capture the email changing the ratio.

Response: injection solution ratio was updated to 60:1 to reflect original design specifications. Additionally, the total gallons referenced in the 5th sentence was updated to 4,700. The 8th sentence of the 2nd paragraph was revised to read: "The dosing ratio for the Lactoil was reduced to 30:1 with a total volume of injectate of 2,350 gallons, and attempts were made to inject the remaining substrate into each well."

Comment 3, Injection Approach and Variances, Paragraph 2: Based upon emails and Table 1, EPA gathers only the Lactoil injections were completed prior to Irene. Please revise paragraph accordingly. Although Table 1 shows the injection data, please indicate which

wells received the excess injectate in the text. In addition, wells 01, 02, 03 and 04 received the injectate at a 30:1 ratio, which was based upon an email, the PI was 60:1.

Response: The 2nd paragraph was revised to more clearly reflect injection activities. All SRS-B injections (I01D, I02D, I03D, and I04D) were completed prior to Hurricane Irene and each of these wells received extra volume resulting from excess substrate delivered to the site. Contrary to the comment, injection wells I18D, I23S, I23D, I25D, I26S, I26D, and I27D were injected using a ratio of 30:1.

Comment 4, Injection Approach and Variances, Paragraph 2, 7th sentence: Please add a sentence capturing that EPA subsequently spoke with VDEQ about the changes and agreed with VDEQ.

Response: The following sentence was added to the 2nd paragraph: "Subsequent to VDEQ's approval, USEPA reviewed the design modifications and concurred with VDEQs decision."

Comment 5, Table 1: For this well, in Table 1, please add "Could not complete this well" to the Comments/Path Forward column

Response: Table 1 was revised accordingly.

The above responses as well as suggested grammatical changes have been incorporated into the final version of the technical memorandum.

Please do not hesitate to contact me at 757-671-6266 if you have any questions concerning these responses.

Sincerely,



Cecilia A.W. Landin
Activity Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Paul Herman/VDEQ
Administrative Record File