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LETTER AND RESPONSE TO U S EPA REGION III COMMENTS ON DRAFT ENGINEERING
EVALUATION/COST ANALYSIS FOR SOLID WASTE MANAGEMENT UNIT 3 (SWMU3) PIER
10 SANDBLAST YARD JEB LITTLE CREEK VA
10/5/2012
CH2MHILL



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October 5, 2012

USEPA Region 3
NPL/BRAC Federal Facilities Branch (3HS11)
Attn: Mr. Jeffrey Boylan
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Response to USEPA Region 3 Comments on the
*Draft Engineering Evaluation/Cost Analysis for Solid Waste Management Unit 3 Pier 10
Sandblast Yard*
Joint Expeditionary Base Little Creek, Virginia Beach, Virginia
Navy CLEAN 1000, Contract N62470-08-D-1000, Task Order WE07

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL is pleased to submit the following response to USEPA Region 3's comments received via email on September 19, 2012 on the *Draft Engineering Evaluation/Cost Analysis for Solid Waste Management Unit 3 Pier 10 Sandblast Yard, Joint Expeditionary Base Little Creek, Virginia Beach, Virginia* (CH2M HILL, August 2012):

Comment 1: Page 2-5, Section 2.5 Development of Cleanup Goals: The text should specifically indicate when these cleanup goals were developed and agreed to by the partnering team and EPA BTAG (identify the document).

Response 1: The text has been revised to indicate that the cleanup goals were discussed during the November 2008 Tier I Partnering Team meeting and initially documented in the *Final Technical Memorandum Work Plan for Pre-Feasibility Study Sediment Sampling* (CH2M HILL, 2009).

Comment 2: Page 2-6, Section 2.6 Determination of Removal Area: The text states "A grid is defined as being 'impacted' if the remediation quotient (RQ) for one or more individual COC exceeds 1.5 and the average RQ for the five COCs exceeds one." Again, the text should specifically indicate when these criteria were developed and agreed to by the partnering team and EPA BTAG. Also, the identification of grids (grid numbers) that are proposed to be removed from the remedial area is not evident on Figure 2.5. If the grids proposed to be removed do not meet the agreed upon criteria for being considered impacted, it is not clear why these grids are being discussed.

Response 2: The text was updated to reflect when the criteria were established and documented. The criteria for determining if a grid is impacted requires that an exceedance of both the individual and average RQ values be present. Because Grids 509, 551, and 558 do not have exceedances of both criteria they are not included within

the remediation area. The text has been revised accordingly. Figure 2-5 has been updated to more clearly depict these grids.

Comment 3: Page 4-1, Section 4.1.2 Alternative 2- Mechanical dredging, off-site solidification, upland disposal, and enhanced natural recovery: The text indicates for this selected alternative "...a clean sand layer..." will be placed in the area where sediment will be removed. The text needs to state what criteria will be used to establish that the sand is clean. In addition the removal action alternatives 2 through 4 call out "enhanced natural recovery" which implies some type of monitoring. Please explain how this part of the alternative will be confirmed (as EPA understands there will be no post removal monitoring conducted).

Response 3: The text has been updated to reflect that prior to placement sand will be sampled to determine its suitability for use as clean fill. Sampling requirements and clean fill criteria will be determined as part of the work-planning phase. No post-removal sampling will be conducted following completion of the NTCRA. As noted in the text No Further Action will be warranted for the removal area. The term "enhanced natural recovery" has been replaced by the term "replacement with clean fill". As noted in the text, the placement of fill will be confirmed through the collection of cores for measurement of sand thickness.

Comment 4: Alternatives 2 through 4 specify the completion of pre-delineation subsurface sediment sampling to determine the final dredge depths. The document should indicate the minimum depth to which sediment will be removed (which EPA understands is 2 feet based upon the type of dredging equipment used). Please modify the Pre-Delineation Sampling section of each alternative to indicate that a minimum of 2 feet will be removed.

Response 4: The paragraph was revised to read: "Prior to completion of the work planning phase, pre-delineation subsurface sediment sampling will be conducted to determine the required final dredging depths. As a result of the equipment being utilized (mechanical dredge), a minimum of 1 foot of sediment will be removed, plus an allowance for an additional 1 foot of overdredge (2 feet total). For the purposes of this EE/CA, it is assumed that removal of 2 feet of impacted sediment is required, plus an allowance for an additional 1 foot of overdredge (3 feet total)."

The above response (and other Team comments/responses) will be incorporated into the draft final version of the SWMU 3 EE/CA to be submitted for public comment.

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

Sincerely,



Cecilia Landin
Project Manager

cc: Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Paul Herman, P.E./VDEQ
Ms. Mary Anderson/CH2M HILL
Administrative Record File