

N61414.PF.002088
JEB LITTLE CREEK
5090.3b

LETTER FROM VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY REGARDING
FINAL SECOND COMPREHENSIVE FIVE YEAR REVIEW NAB LITTLE CREEK VIRGINIA
BEACH VA (PUBLIC DOCUMENT)

03/25/2014

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

Fax: 804-698-4019 - TDD (804) 698-4021

www.deq.virginia.gov

March 25, 2014

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4020
1-800-592-5482

Mr. Bryan Peed
NAVFAC Mid Atlantic
9742 Maryland Avenue
Code OPHREV4, Bldg. N-26, Rm.3300
Norfolk, Virginia 23511-3095

Subject: Joint Expeditionary Base Little Creek
Final Second Comprehensive Five Year Review

Dear Mr. Peed:

Thank you for providing the Virginia Department of Environmental Quality (VDEQ), Office of Remediation Programs (ORP) the opportunity to review and comment upon the document entitled *Final Second Comprehensive Five Year Review, Joint Expeditionary Base Little Creek* dated March 2014. Both the preceding draft and referenced final document were reviewed by VDEQ – ORP staff, in accordance with the *EPA Comprehensive Five-Year Review Guidance* (OSWER No. 9355.7-03B-P), CERCLA §121(c) and the NCP 40 CFR §300.430(f)(4)(ii). During the review process, our staff conducted a parallel cursory evaluation of all relevant documentation.

As stated in the last paragraph of Section 1.1 of the *Final Second Comprehensive Five Year Review (Report)*, VDEQ recognizes the requirement to conduct the Five Year Review protectiveness determination was triggered by the remedy presented in the December 2003 Record of Decision (ROD) prepared and signed by the Navy, concurred upon by VDEQ, and signed by the EPA. The December 2003 ROD addressed the remedial action to be implemented at the Site 9 - Driving Range Landfill and the Site 10 - Sewage Treatment Plant Landfill. Since December 2003 the Navy has prepared and signed RODs for five more sites each of which was concurred upon by VDEQ and signed by the EPA and is included in this Report. The five additional sites addressed in this Report are: Site 7 – Amphibious Base Landfill (September 2009); Site 11 - School of Music Plating Shop (July 2007); Site 11a – Building 3033 Former Vehicle Repair Facility and Waste Oil Tank (August 2011); Site 12 - Former Exchange Laundry/Dry Cleaning Facility (September 2005); and Site 13 - Former Public Works Pentachlorophenol Dip Tank and Wash Rack (July 2007).

A brief summary of each remedy, its protectiveness, and associated recommendations follows.

- For Site 7, the ROD identified soil remedy - installation of a soil cover over waste, land use controls, and long-term monitoring - was implemented, is functioning as designed, and is protective of human

health and the environment. VDEQ supports the recommendation to evaluate remedy costs and prepare all appropriate documentation, as needed.

- For Sites 9 and 10, the ROD identified soil remedies - installation of a soil cover over waste, land use controls, and long-term monitoring - have been implemented, are functioning as designed, and are protective of human health and the environment. VDEQ supports the recommendation regarding the sampling of groundwater and development of a groundwater sampling plan in conjunction with Five-Year Reviews to demonstrate continued remedy protectiveness. VDEQ also supports the recommendation to: a) repair the existing ruts in the soil cover; b) remove all surface debris from the cover; c) continue annual landfill inspections to monitor cover conditions and possible continued debris disposal activities; and d) conduct an investigation to determine the means by which debris has been disposed in the area and recommend methods to prevent future disposal activities.
- For Site 11, the ROD identified groundwater remedy - enhanced reductive dechlorination, long term monitoring, and land use controls - has been implemented, is functioning as designed, and is protective of human health and the environment. VDEQ supports the recommendation to sample for the emerging contaminant 1,4-dioxane to confirm its presence or absence in groundwater.
- For Site 11a, the ROD identified groundwater remedy - enhanced reductive dechlorination, long term monitoring, and land use controls - has been implemented, is functioning as designed, and is protective of human health and the environment. VDEQ supports the recommendation to evaluate remedy costs and prepare all appropriate documentation, as needed.
- For Site 12, the ROD identified groundwater remedy - in-situ chemical oxidation/enhanced reductive dechlorination, long term monitoring, and land use controls - has been implemented, is functioning as designed, and is protective of human health and the environment. VDEQ supports the recommendation to revise existing surface water project action levels to account for potential ecological exposures at the groundwater/surface water interface within the canal.
- For Site 13, the ROD identified groundwater remedy - enhanced reductive dechlorination, long term monitoring, and land use controls - has been implemented, is functioning as designed, and is protective of human health and the environment. VDEQ supports the recommendation to evaluate remedy costs and prepare all appropriate documentation, as needed.

VDEQ concurs with the protectiveness summaries and associated recommendations provided for each site addressed in the Report.

Should you have any questions or comments, please contact Mr. Paul Herman at (804) 698-4464.

Sincerely,



Durwood H. Willis

Director

Office of Remediation Programs

cc: JEB Little Creek Tier 1 (electronic copy only)
JEB Little Creek correspondence file
Milt Johnston, VDEQ-TRO (electronic copy only)