

7/20/05-00888

July 20, 2005

Mr. Paul E. Herman, P.E.
Remedial Project Manager
Virginia Department of Environmental Quality
629 East Main Street, 4th Floor
Richmond, VA 23219

Subject: Response to Comments, *Draft Work Plan, Site Screening Assessment SWMUs 5, 6, 13 and Site 6*, Naval Amphibious Base Little Creek, Virginia Beach, Virginia

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received from VDEQ on the *Draft Work Plan, Site Screening Assessment SWMUs 5, 6, 13 and Site 6*, Naval Amphibious Base Little Creek, Virginia Beach, Virginia:

1. Section 2.2.1: Rewrite the 3rd sentence of the 1st paragraph. A suggested revision follows, "From 1943 until approximately 1993, spent lead acid batteries containing electrolyte solution, and painting wastes, oily wastes, and scrap metal were temporarily stored on wooden pallets prior to offsite disposal. The pallets were placed on bare soil approximately 100 feet south of Pier 61 outside the southeast corner of Building 103 (Figure 2-3)." In the 2nd paragraph, insert a space between "6" and "uncovered" in the 1st sentence. In the 3rd paragraph, add an "S" to the acronym "RRR" that appears in the last sentence.

Response: The changes have been incorporated into the final document.

2. Section 2.2.2: Please, show Building 3896 on Figure 2-4. If this building no longer exists, show its outline with blue cross-hatching, or something. In the 2nd paragraph, rewrite the 2nd and 3rd sentences. The following revision is offered, "One organic compound, benzo(a)pyrene, was detected in one soil sample at a level that exceeded both the residential and industrial RBC (Table 2-3)."

Response: Building 3896 was labeled incorrectly as Building 3895 in draft Figure 2-4, appropriate changes have been made to Figure 2-4. Appropriate changes were made to Section 2.2.2 text.

3. Section 3.2.1: Add the following sentence to the end of the 2nd paragraph, "Prior to sampling, the temporary well will be developed until the field parameters stabilize as described in the SOP provided in Appendix A."

Response: A temporary well was not needed at Site 6 and the field crew was able to collect the lead sample utilizing DPT. Groundwater quality parameters were recorded at the time of sample collection. The text in the Work Plan will not be changed because this revision has been overcome by the field event itself. Documentation of DPT collection will be provided in the SSA Report for the site.

4. Section 3.3: Add the following phrase to the last sentence of the last paragraph, "taken a minimum of 3 minutes apart."

Response. First sentence of last paragraph Section 3.3 has been changed to read "Water quality parameters will be measured and recorded every three to five minutes before sampling using a Horiba U-22 water quality meter."

5. Section 3.11: Include the State Ground Water Standards in the list that will be used to compare analytical results against.

Response: It has been the Navy's understanding that the VDEQ Federal Facilities Program defers to Federal MCLs within the CERCLA program. However, the Virginia Groundwater Standards are a potential ARAR that will be considered as part of the ROD process for NAB Little Creek's CERCLA sites. Therefore, the Navy proposes that constituents detected in groundwater during the SSA will be screened against Federal MCLs, USEPA Region III tap water risk based concentrations, and basewide background groundwater levels. Additionally a qualitative human health/ecological risk analysis will be performed to identify potential contaminants of concern. If in the instance any groundwater issues are identified in the SSA which warrants an RI/HHRA/ERA and site closure with a PRAP/ROD, State Groundwater Standards would be considered as an ARAR.

6. Table 3-2: Please, include definitions for the acronyms ILM and OLM and ICP/MS.

Response: Acronym definitions have been added to Table 3-2.

If you have any questions concerning these comments, please give me a call at (804) 698-4464.

Sincerely,

Jamie Butler,
Project Manager

cc: Ms. Mary Cooke/USEPA
Ms. Lora Fly/ NAVFAC Mid Atlantic