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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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March 13, 1997

Mr. Scott R. Park
Department of the Navy
Atlantic Division, Code 1822
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Dear Mr. Park:

Thank you for providing the Department of Environmental Quality, Waste Division, Office of Federal Facilities Restoration, a copy of the *Draft Final Feasibility Study, Site 7: Amphibious Base Landfill, Naval Amphibious Base Little Creek, Virginia Beach, Virginia.*

Attached are our comments and questions regarding the report. If you have any questions concerning these comments, feel free to contact me at (804) 698-4227.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert J. Weld'.

Robert J. Weld
Remedial Project Officer
Federal Facilities Restoration

cc: Durwood Willis - VDEQ
Kelly Greaser - NABLC
Bob Stroud - U.S. EPA

**VDEQ Comments and Questions on
Draft Final Feasibility Study, Site 7 Amphibious Base Landfill
Naval Amphibious Base Little Creek (NABLC), Norfolk, Virginia**

- 1) Section 1.2, pg. 1-5, 1st para: This paragraph indicates that the landfill was used for temporary storage of wastes after it was closed. Specifically, what type of wastes were stored at the landfill and for how long?
- 2) Section 1.4, pg. 1-24, 3rd para: Same comment as above.
- 3) Section 1.6, pg. 1-26, Last Bullet: Additional discussion regarding ecological assessments and potential impacts from Site 7 is necessary. It should be noted that the Supplemental Ecological Assessment (SEA) for NABLC is not yet finalized and there are still outstanding concerns associated with the report that may have an impact on Site 7. Specifically, groundwater transport to the surface water pathway.
- 4) Section 2.1.3, pg. 2-22, 6th para: Please provide further explanation and/or a citation regarding VDEQ's delegation of authority to LANDTIV regarding land disturbing activities.
- 5) Section 2.2, pg. 2-24: A Remedial Action Objective (RAO) should be added which includes the mitigation of ecological risks attributable to Site 7. This may be dependant upon discussion of Comment #3 and the resolution of comments on the SEA.
- 6) Section 4.2.1, pg. 4-7, Last para: In a NABLC letter dated September 9, 1994, from W.L. Niven, it is stated that "In the future, surface water samples will be analyzed for cyanide" at Site 7 (Site 7, Section 7-3). This was in a response to comments received from VDEQ on the Draft Final RI/FS for NABLC (letter dated July 15, 1994 from Erica S. Dameron). Please explain why cyanide is not included in the list of analyses that is outlined for the monitoring plan under this alternative and others.
- 7) Section 4.2.1, pg. 4-8, 2nd para: Will monitoring reports be generated on a semi-annual basis that document the results of the sampling and comparison to trigger levels? These reports should be submitted for regulatory review.
- 8) Section 6.0, pg. 6-1, 2nd bullet: The term "standard practice" needs to be more clearly defined. Are there any instances where the locality is likely to allow use of the shallow aquifer as a potable source.

End of Comments.