

06.01-05/28/97-00255



DEPARTMENT OF THE NAVY

NAVAL AMPHIBIOUS BASE LITTLE CREEK

2600 TARAWA COURT SUITE 100

NORFOLK, VIRGINIA 23521-3229

IN REPLY REFER TO:

5090

Ser N464/1112

28 MAY 1997

From: Commanding Officer, Naval Amphibious Base Little Creek
To: Commander, Atlantic Division, Naval Facilities Engineering
Command (Code 18223)

Subj: COMMENTS ON THE DRAFT DECISION DOCUMENT, SITE 7

Encl: (1) Subject comments

1. Enclosure (1) is forwarded for inclusion in the final comments list for the Draft Decision Document, Site 7 prepared by CH2M HILL, Ltd.

2. For additional information, my point of contact for this matter is Kelly Greaser at 363-4571.

A handwritten signature in black ink, appearing to read "W. L. Niven", is centered on the page.

W. L. NIVEN
By direction

NAB LITTLE CREEK

COMMENTS ON THE DRAFT DECISION DOCUMENT, SITE 7

In general - For all future documents, do not stamp "Draft" on any pages of text, tables, or figures. It is very distracting. The stamp should only appear on the front cover and table of contents, if necessary. Also, for all future documents, the water table aquifer CANNOT be called a Class III aquifer. The only thing we can say is that it is not currently used, and is not planned to be used, for drinking water purposes.

Acronyms and Abbreviations - The first letter of each word in the following acronyms should be capitalized: ARAR, BNA, ECOC, GCL, HDPE, HI, ICR, MCL, PCBs, QI, RAO, VOC.

Section 1.1 - Add "Department of Environmental Quality (VDEQ)" at the end of the last sentence of the last paragraph.

Page 1.2 - The name of the current CO is Leroy A. Brown.

Page 2-1 - Delete the last sentence of the second paragraph.

Section 2.3 - The second to last sentence and other similar sentences in this document make it's very existence contrary to what is stated. Therefore, can we call the next draft "2nd Draft" and definitely not "Draft Final"?

Section 2.6.1.4.1 - The last sentence is not true. The majority of the risk comes from arsenic, detected at the highest concentration under the road crossing the west canal. If only downgradient locations are considered in the risk calculation, the HI drops from 16.1 to 15.37 for child and the ICR remains unchanged. So we cannot say that the highest concentrations were detected upgradient. We can de-emphasize the current risk from the site by stating that this is a Navy base, the majority of the area is within an explosive arc from the magazine, and so the area is frequently controlled, so trespassers living on the site are highly unlikely, and have never before been encountered. We can also state that significant concentrations were detected upgradient, so the contribution to the total risk from these upgradient sources is significant.

Section 2.6.1.4.2 - The end of this section should also report the risk to adult from surface water.

Page 2-13 - Delete "total" from the first sentence in the paragraph before the last set of bullets.

Page 2-14 - Change the second bullet at the top, and all other similar bullets to: "Conduction of a 5-year ...". The third paragraph is extremely confusing, redundant, and unclear. Please change it to something like the third paragraph on the next page.

Page 2-16 - The last two sentences of the second paragraph state that biennial reviews will be completed. This should be changed to 5-year reviews.

Page 2-17 - Change the last two sentences of the last paragraph to: "The water-table aquifer at the site is not used for drinking water and ...". Make this same change on page 2-22 in the first bullet.

Page 2-18 - Delete "part of" from the first sentence in the fourth paragraph.

Page 2-19 - Virginia Beach does NOT "prohibit" the use of the water table aquifer for drinking water. Please use the wording from the original conversation reported in the PRAP for 9 and 10.

Page 2-20 - At the top, the acronym "VDH" is not in the table in the front, and it has not been previously used, so spell it here.

Page 2-22 - Delete the "s" from "contacts" at the very top of the page.

Page 2-30 - Delete the second sentence of the fourth paragraph. It does not agree with the discussion of the E.O. on page 2-13. Insert "2" after "Alternative" in the next sentence.

Page 2-31 - Delete the "0" before "result" in the second sentence at the top.