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FOSTER WHEELER ENVIRONMENTAL CORPORATION

Robert J. Weld
Commonwealth of Virginia
Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219

August 15, 1997

Mr. Weld,

Please review the attached responses to VDEQ comments and questions on the Draft Final Feasibility Study for Site 7, the Amphibious Base Landfill, at the Naval Amphibious Base Little Creek (NABLC), Norfolk, Virginia. These responses are being forwarded directly to you at the request of Scott Park, LANTDIV.

If you have any questions or need additional information, please feel free to contact me at (540) 785-4651.

Sincerely,

Robert J. Onderko
Project Manager

cc: Scott Park

**Responses to VDEQ Comments on the
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?

Response: Section 2.2.1, page 2-12 of the Supplemental Ecological Assessment (SEA) identifies the waste activities which occurred at the landfill during the stormwater survey. Specific records of the wastes stored at the landfill were not kept, however, records indicate that all material was “inert”. Wastes were stored at the site prior to disposal or recycling. The specific length of time these wastes were stored at the site, was not recorded.

- 2.) Section 1.4, pg. 1-24, 3rd para: Same comment as above.

Response: As stated above, only inert material was stored on-site. All records indicate that any PCB containing material was stored elsewhere at the base. This segregation was maintained to avoid violation of regulations pertaining to storage of various waste-types.

- 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.

Response: Issues raised by the SEA will be addressed in the Responsiveness Summary for the SEA.

- 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 LANDTDIV regarding land disturbing activities.

Response: LANTDIV is authorized to review and approve Erosion and Sediment Control Plans for land disturbing activities through an agreement with the Virginia Department of Conservation and Recreation's Division of Soil and Water Conservation. The agreement is renewed annually by letter. LANTDIV is currently in the process of renewing their authority. In the meantime, verbal authority to continue the review and approval process has been provided by John T. Baranowski, Training and Certification Coordinator, Virginia Department of Conservation and Recreation. Mr. Baranowski can be reached at 804-371-7532.

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 dependent upon discussion of Comment #3 and the resolution of comments on the SEA.

Response: See response to Comment #3 above.

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 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.

Response: Cyanide will be added to the list of analyses for the monitoring plan under the various alternatives. The Navy proposes if after two to four rounds of sampling cyanide is non-detect in all samples, analysis of cyanide will be dropped from the sampling program.

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.

Response: Data summaries will be provided on a semi-annual basis. A formal report will be prepared after three years of sampling (This will allow time to assemble a reliable database from which to determine trends and potential data gaps). The report will be submitted for regulatory review, and will include a detailed discussion of analytical results and recommendations for future sampling. Proposed changes in sample frequency, analytical parameters, and/or sample locations may also be presented in this report.

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?

Response: The 2nd bullet on page 6-1 will be replaced with, “Present or future use of the shallow aquifer as a potable water source will be controlled by land use restrictions. The land use restrictions will be implemented by notation in the NAB Little Creek Base Master Plan, the comprehensive planning document consulted by base personnel when making planning, development, and construction decisions, and by documenting the restrictions in the NAB Little Creek real estate files maintained by the Atlantic Division, Naval Facilities Engineering Command.” In addition, Base Operating Departments will be required to notify and receive concurrence from the Base Civil Engineer Environmental Office prior to all intrusive activities in the vicinity of the site.