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January 26, 2005

Ms. Mary Cooke
US EPA Region III
1650 Arch Street
Philadelphia, PA 19103

SUBJECT: Response to comments, *Draft Engineering Evaluation and Cost Analysis for the Amphibious Base Landfill Site 7, NAB Little Creek, Virginia Beach, Virginia*

Dear Ms. Cooke:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received from USEPA on the *Draft Engineering Evaluation and Cost Analysis for the Amphibious Base Landfill Site 7, NAB Little Creek, Virginia Beach, Virginia*:

General Comments

1. The additional information that is requested to be added to the document will help to further support the proposed action. This may be particularly useful given the inclusion of Appendix A which includes the recommendation to delay an IRA pending the definition of site specific ecological risk associated with canal sediment.

Response: The Tier I Partnering Team, in agreement with BTAG representatives, concurred in September 2004 that the potential ecological risks associated with Site 7 would be acceptable following the removal of canal sediments. The extent of sediment removal was agreed upon and included removal and backfill of sediment from the abutment to Amphibious Drive extending north to sample SD218. The predetermined extent of removal precludes the need for post-construction confirmation samples.

2. Alternative 3 includes the removal of surface debris from the edge of the landfill. Removal of this debris provides the opportunity to restore tidal wetlands by not backfilling. Elevations in existing wetlands could be used to

determine the target elevation for the wetlands. Wetlands could also be restored along the edge of the canal when the road crossing is removed. This approach should save money as these areas would not need to be backfilled. For areas where debris is on the shoreline, removal of the debris provides the opportunity for restoration of the shoreline, so that vegetation can become established.

Response: Because the surface debris located along the edge of the landfill was determined to be more extensive than originally estimated based on recent site reconnaissance, Alternative 3 is no longer the preferred. However, further delineation activities are scheduled in the spring of 2005 to quantify the amount of debris on site, and debris removal may be considered as part of the PRAP/ROD remedial action process if warranted.

Specific Comments

1. Section 2.2.10 on page 2-7 states that the ERA suggests that potential exposure and risk to lower trophic level receptors are possible in the central portion of the canal. However, the habitat value of this drainage canal is minimal, so exposures are likely to be low. There is no data presented to support this statement. A recent site visit showed vegetated wetlands and tidal mudflats in this canal, and the presence of invertebrates (including oysters), suggesting that the canal does provide habitat for ecological receptors.

Response: The last sentence in this section has been removed.

2. Section 2.2.12 on page 2-8 provides a summary of the surface debris located along the shoreline of the landfill. The section states that approximately 55 cubic yards of debris are present. A recent site visit on November 10, 2004 with BTAG found that several of these debris areas are much larger than the estimates in Figure 2-2, and some extend into the subsurface. The information presented in Figure 2-2 should be revised to reflect the information collected as part of the recent site visit.

Response: Figure 2-2 has been removed from the Draft Final Document pending further debris delineation activities at Site 7.

3. Section 4.1 provides a description of the alternatives evaluated as part of this EE/CA. Alternatives 2 and 3 include a component that includes the removal of one foot of sediment from the canal for a distance of 885 feet. The site visit on November 10, 2004 found that the canal contains several areas of tidal vegetated wetlands and intertidal mudflats. If these wetlands or mudflats are excavated, these areas should be backfilled to the same elevation and

vegetated (in the case of vegetated wetlands). This should include taking elevations prior to the removal and after backfill placement to ensure the same elevation is achieved.

Response: Comment noted. Wetlands restoration will be considered as part of the removal action.

If you have any questions concerning any of these comments, please call me at (757) 873-1442, ext. 28.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna Caldwell", is written over a light gray rectangular background.

Donna Caldwell
Activity Manager

cc: Ms. Dawn Hayes, NAVFAC Mid Atlantic
Mr. Paul Herman, VDEQ
Ms. Donna Caldwell, CH2M HILL
Ms. Lora Fly, IR Coordinator
Ms. Bonnie Capito, NAVFAC Mid Atlantic
Ms. Jamie Butler, CH2M HILL

