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COMMONWEALTH of VIRGINIA

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November 8, 2004

Mrs. Dawn M. Hayes, P.E.
Naval Facilities Engineering Command
Atlantic Division Headquarters, Code EV22
6506 Hampton Blvd
Norfolk, VA 23508-1278

Subject: Naval Amphibious Base Little Creek
*Draft Engineering Evaluation/Cost Analysis for
Demolition Debris Landfill and Adjacent Wetland/Aquatic Areas
IR Site 8*

Dear Mrs. Hayes:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft Engineering Evaluation/Cost Analysis for Demolition Debris Landfill and Adjacent Wetland/Aquatic Areas IR Site 8* dated September 2004. Based on the VDEQ review we offer the following comments:

1. Section 3.3: Replace the public comment period of "November 1 through December 1, 2004" with the actual public comment period.
2. Section 4.1.3: The second to last sentence of the last paragraph discusses reuse of the existing topsoil cover over the buried waste layer. Include a sentence or two discussing the sample analyses that will be run to ensure this soil is suitable for reuse.
3. Section 4.2.3: Surface water samples collected from Pond 2 showed elevated levels of zinc (LS08-SW208-02A: zinc = 131 ug/l) that exceeded the Virginia Water Quality Standards (VWQS for zinc: acute saltwater criteria = 95 ug/l, chronic saltwater criteria = 86 ug/l). Since the EE/CA proposes to de-water this pond and discharge the pumped water to the adjacent inlet, the Virginia Water Quality Standards become an ARAR that needs to be included in Appendix B and addressed in this Section. Also, the method of treatment to address the elevated zinc in the pond effluent (de-water) needs to be included in this Section and in the overall cost of the Alternative.

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

Sincerely,

Paul E. Herman, P.E.

Remediation Project Manager

cc: NABLC Tier 1 (electronic copy)
NABLC Correspondence File
Milt Johnston, VDEQ-TRO