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CH2MHILL

November 29, 2004

Mr. Paul Herman, P.E.
Remedial Project Manager
Virginia Department of Environmental Quality
629 East Main Street, 4th Floor
Richmond, VA 23219

SUBJECT: Response to comments, *Draft Engineering Evaluation and Cost Analysis for Site 8, Demolition Debris Landfill, NAB Little Creek, Virginia Beach, Virginia*

Dear Mr. Herman:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received from VDEQ on the *Draft EECA for Site 8, Demolition Debris Landfill, Naval Amphibious Base Little Creek, Virginia Beach, Virginia*:

Comment No. 1:

Section 3.3: Replace the public comment period of "November 1 through December 1, 2004" with the actual public comment period.

Response to Comment No. 1:

Comment Noted. The public comment period will be amended in the Draft Final and Final version of the document.

Comment No. 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..

Response to Comment No. 2:

None of the soil removed during excavation activities will be reused at the site for the wetland construction. All statements regarding the reuse of site soil will be removed from the document for draft final submittal.

Comment No. 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.

Response to Comment No. 3:

Dewatering will not be conducted during the Site 8 debris removal or wetland construction activities. Instead, nuisance water will be managed within the site boundaries. All text describing dewatering activities will be amended for draft final submittal and replaced with nuisance water management.

If you have any questions concerning any of these comments, please call me at (757) 460-3734, ext. 12.

Sincerely,



Paul Landin, P.E.
Activity Manager

cc: Ms. Dawn Hayes, LANTDIV
Ms. Mary Cooke, USEPA Region III
Ms. Donna Caldwell, CH2M HILL
Ms. Lora Fly, IR Coordinator