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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Becky Norton Dunlop
Secretary of Natural Resources

~ November 7, 1996

Mr. Scott R. Park
Department of the Navy
Atlantic Division, Code 1822
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, Virginia 23511-2699

Dear Mr. Park:

Thank you for providing the Department of Environmental Quality, Waste Division, Office of Federal Facilities Restoration, a copy of the *Background Ground Water Quality Study, Naval Amphibious Base Little Creek, Norfolk, Virginia.*

The subject document was reviewed for the purpose of documenting supporting information for NABLC's determination of the Columbia Aquifer as a Class III aquifer as specified in the Proposed Remedial Action Plan for Sites 9 & 10. Upon completion of our review, it is evident that the Background Study does not provide sufficient information to make this determination.

In actuality, the Background Study concludes that the ground water in the Columbia Aquifer at NABLC is of high quality when measured against current Safe Drinking Water Act Primary (SDWA) MCLs and Virginia Ground Water Quality Standards. Although the report indicates that levels of certain contaminants (specifically aluminum, iron, and manganese) do exceed SDWA Secondary MCLs and Virginia Water Quality Criteria for Groundwater, these criteria are not health based levels and are not enforceable. They are to be used as scientific guidance to maintain water quality and prevent ground water pollution.

In absence of a State classification system, VDEQ utilizes EPA's Guidelines for Groundwater Classification (1986) as a tool to evaluate ground water. This system defines drinking water as water with a Total Dissolved Solids (TDS) less than 10,000 mg/l, or which can be used without treatment, or which can be treated using methods reasonably employed in public water supply systems. Although ground water at NABLC may not currently be used for drinking water, it has the

potential for future use based on TDS levels indicated in the Background report (all less than 10,000 mg/l). Additionally, the high levels of other naturally occurring contaminants previously discussed are often treated by routine methods employed in water supply systems. Therefore VDEQ can not endorse the classification of the Columbia Aquifer at NABLC as a Class III aquifer based on the current information.

This does not necessarily indicate that VDEQ will require cleanup to drinking water standards; however, site-specific evaluations will need to be performed to determine appropriate cleanup goals. It is recommended that NABLC contact the local office of the State Health Department regarding the existence of current water supply wells in the vicinity and the City of Norfolk to determine if there are local restrictions on the installation of new water supply wells in the area of NABLC.

If you have any questions or would like to discuss this further, please feel free to contact me at (804) 698-4227.

Sincerely,

A handwritten signature in black ink, appearing to read "R. J. Weld", with a large, stylized flourish at the end.

Robert J. Weld
Remedial Project Officer
Federal Facilities Restoration

cc: Durwood Willis - VDEQ
Kelly Greaser - NABLC