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February 22, 2005

Mr. Paul E. Herman, P.E.
VDEQ
P.O. Box 10009
Richmond, Virginia 23240

Subject: Responses to Comments – Draft Interim Remedial Action Completion Report
For Site 9- Driving Range Landfill and Site 10-Sewage Treatment Plant Landfill
Naval Amphibious Base Little Creek, Virginia Beach, Virginia
Navy CLEAN III Program
Contract No. N62470-02-D-6007
Contract Task Order 0210

Dear Mr. Herman:

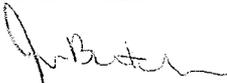
CH2M HILL has prepared the following responses to VDEQ comments of January 25, 2005 on the Draft *Interim Remedial Action Completion Report for Site 9, The Driving Range Landfill and Site 10, The Sewage Treatment Plant Landfill* for Naval Amphibious Base (NAB) Little Creek, Virginia Beach, Virginia. Responses to comments are addressed herein.

1. Provide a date for the Report.
Response: The Final Interim Remedial Action Completion Report will be provided as a primary document deliverable (bound with covers and spines including the month and date).
2. Ensure the title of the document on the "Record of Preparation, Review, and Approval" page (page 1) is the same as the title of the Report (page 2).
Response: The title has been revised accordingly.
3. On page 1, the USEPA OSWER Directive 9320.2-09A could not be found by VDEQ's ARARs reviewer. The document that was found is titled USEPA OSWER Directive 9320.2-09A-P dated January 2000. If this is the correct document, please change the text accordingly. Also, include the date of the document, January 2000 or whatever's appropriate, in the text.
Response: USEPA OSWER Directive 9320.2-09A-P dated January 2000 is the correct reference. The text has been revised accordingly.
4. Section 1.1: In order to be consistent with the wording in the ROD, Sites 9 and 10 are located in the "northern" rather than "northeast" portion of NAB Little Creek. Also, the ROD states that Site 9 was operated from "1952 through 1956" rather than "1950 through 1956" as stated in the Report.
Response: In order to be consistent with the wording in the ROD, the text in the IRACR has been revised to locate Sites 9 and 10 in the northern portion of NAB Little Creek. However, the operational period for Site 9 as stated in the ROD (1952-1956) is incorrect. It is recommended the operational period for Site 9 remain from 1950 – 1956 as stated in the RFA and SWMU/IR summary for NAB Little Creek.
5. Section 1.2: Decide whether or not the term "landfills" should be capitalized and use the appropriate case consistently throughout the report. Also, define the acronyms PRAP, DD, LUC, LTM, and RAO and include the acronym "(COCs)" after it's written out in the 8th sentence of the Section. Add the word "exposure" at the end of the 4th sentence so that it reads, "risks due to ecological and human health exposure".
Response: The text has been revised with the term "Landfill" capitalized only when used in conjunction with the site name. For example "The Driving Range Landfill or the Sewage Treatment Plant Landfill". All other uses of the term landfill are not capitalized in the final deliverable. Additionally, all acronyms are spelled out the first time they are used in the document, and "COCs" has been added to the text accordingly.

Mrs. Dawn M. Hayes, P.E.
Naval Amphibious Base Little Creek
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6. Section 2.0: In the 2nd bullet of the first set of bullets, change the word “for” to “from”. In the second set of bullets, add a comma at the end of the 2nd bullet.
Response: The text has been revised accordingly.
7. Section 4.0: Determine whether the “Chronology of Events” is to be presented by event or by date. Ensure that the first column represents the topic that is in chronological order. Then, ensure the chronology of the topic is correct. As presented in the report, the dates are not listed in chronological order.
Response: Chronology of events is listed by date. Some items such as the LTM dates and quarterly inspection dates have been removed from the table because they indicate an action and not a deliverable. The document deliverable describing the action is provided.
8. Section 7.0: In the 1st bullet, change the phrase “have been conducted” to “will continue.”
Response: The text has been revised accordingly.
9. Section 9.0: No lessons learned? What about the lesson learned from the unauthorized hole dug in the cover at Site 10? That experience showed that if a request is made to do anything on a landfill cover and the request is denied by Base Environmental because the proposed activity could compromise the integrity of the cover, then a follow-up inspection should be conducted by Base Environmental to ensure the denied activity did not take place and the landfill cover is intact.
Response: The following paragraph explanation has been provided for the Site 10 excavation pit lesson’s learned.
“In April 2004, breach of the soil cover within Site 10 was discovered. Subsequent evaluations identified no unacceptable risk to human health or the environment from potential exposure due to the breach. The Navy, in partnership with the USEPA and VDEQ determined conducting landfill inspections on a more frequent basis would ensure a timely response to LUC infractions. Therefore, quarterly landfill integrity inspections were included in the development of the Post ROD LTM Project Plans for Sites 9 and 10 (Appendix A)”.
10. Section 10.0: Please, add “P.E.” to Mr. Paul Herman.
Response: The text has been revised accordingly.

Sincerely,
CH2M HILL



Jamie Butler
Project Manager

cc: Ms. Dawn Hayes/LANTDIV
Ms. Mary Cooke/USEPA
Ms. Lora Fly/CNRMA
Ms. Donna Caldwell/CH2M HILL