



DEPARTMENT OF THE NAVY

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From: Commander, Navy Region, Mid-Atlantic
To: Commander, Atlantic Division, Naval Facilities Engineering
Command (Code 18222)

Subj: COMMENTS ON THE DRAFT IMPLEMENTATION PLAN FOR SITE 13 AND
PROPOSED WELL LOCATIONS FOR SITE 11, NAVAL AMPHIBIOUS BASE
LITTLE CREEK

Encl: (1) Subject Comments

1. Enclosure (1) is forwarded for inclusion in the final
comments list for the subject documents prepared by CH2M HILL,
Ltd.

2. For additional information, my point of contact is Ms. Kelly
Greaser, 462-4571.

Cheryl F. Barnett
CHERYL F. BARNETT
By direction

**NAVAL AMPHIBIOUS BASE LITTLE CREEK
COMMENTS ON THE DRAFT IMPLEMENTATION PLAN FOR SITE 13**

In General - Many of the following comments are because ORC/HRC will not be placed as part of the removal action.

Page 1-1 - Change the last sentence of the second paragraph to: "The ORC/HRC will be injected via Geoprobe into the lower portions of the aquifer beneath the PCP source area."

Page 1-4 - In the last paragraph change the dimensions of excavation to 46.5' by 17'.

Page 2-1 - In the first paragraph, delete the extra "e" in "Environmental". In the last sentence of the second paragraph, change the ",", to a ")".

Page 2-2 - In the second sentence of the last paragraph, change the second "aerobic" to "anaerobic".

Page 3-1 - In the very first sentence change "eater" to "ester". In the first, second, and fifth paragraphs, change 5 occurrences of a normal 2 to the subscript for CO₂, MgO₂, and Mg(OH)₂. In the second sentence of the second paragraph, change "Lactic" to "lactic".

Page 4-1 - Change the date the microcosms will be completed accordingly.

Page 5-1, section 5.1 - In the first paragraph, the replacement wells for 8S and 8D have been identified as 21S and 21D. Why not keep the same numbers to avoid confusion? Also, change the next paragraph to: "The new wells will be installed prior to the proposed injection of ORC/HRC."

Page 5-2 - Change the second sentence of the first paragraph to: "This will be done prior to ORC/HRC injection and at least 24 ...".

Table 2 - Due to the removal of soil down to 8' in the area of proposed wells 21S and 21D, why not make the screen for 21S 8-17' and for 21D 17-25'?

Table 3 - Why not analyze for Fe and Mn?

Section 5.3 - Delete all references to placement during the removal action. The last paragraph of this section states that a five-foot radius of influence is anticipated. Is this for ORC or HRC? Since ORC and HRC have very different viscosities, this

should be different for the two compounds. Also, if five feet is anticipated for ORC, this seems very low. Based on case studies, we should anticipate 20' or greater. Please give the basis for this assumption.

Figure 2 - Please add contour lines to this figure.

Figure 5 - Please add a box around the legend since it blends in with the figure.

**NAVAL AMPHIBIOUS BASE LITTLE CREEK
COMMENTS ON THE PROPOSED WELL LOCATIONS FOR SITE 11**

1. The second paragraph from the bottom on the second page states that samples from the most contaminated wells (5D and 4D) will be collected and analyzed for full VOCs and SVOCs. However, previous sample results from these wells had high detection limits due to the high contamination. Please ensure that low (at least less than 10 ppb) detection limits will be possible in these samples. Otherwise, recommend choosing a different location for the analyses of full VOC and SVOCs.

2. Based on Figure 1-1, the geoprobe investigation in June-July 98 detected 132 ppb VOC in GP-213. Well 9D was installed very close by. However, when the well was tested, 2575 ppb VOCs were detected. Another geoprobe was taken in the same general area with the results being ND. Because of the possibility that the geoprobe results underestimate what may actually be in the aquifer, recommend moving the location of well 12D to the east about 200'. The same argument can be made for well 14D. Recommend using well 19 from Site 13 in lieu of the proposed well 14D.