

6/16/05-00867



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June 16, 2005

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 Final Site 12 Proposed Remedial Action Plan for Site 12: Former Exchange Laundry/Dry Cleaning Facility* 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 PRAP for Site 12*, Naval Amphibious Base Little Creek, Virginia Beach, Virginia:

Comment:

During the development of alternatives, the Little Creek Partnering Team discussed the need to repair the leaking sanitary sewer prior to initiating any remedial action. Once repaired, additional groundwater level data was to be gathered after the surficial aquifer stabilized and returned to its normal flow pattern (uninfluenced by the leaking sewer). The sewer repair and additional groundwater level data are necessary to ensure the remedial action to be taken is properly implemented and the post-injection monitoring wells are properly located.

The PRAP for Site 12 mentions the leaking sewer line and its impact on local groundwater flow but it does not discuss if or when the leaking line will be repaired. VDEQ requests that the PRAP be modified to include a statement similar to the following, "Prior to initiating any remedial action at Site 12, the leaking sanitary sewer line located near the western edge of the site will be repaired. Following the repair and after sufficient time has elapsed allowing the local groundwater to stabilize, groundwater level data will be collected from the Site 12 monitoring wells for use in determining the groundwater flow direction and velocity. The new groundwater flow data will be incorporated into the design of the Preferred Remedial Alternative."

Response:

The Following sentence has been added to the first paragraph of Section 7. "Following repair of the leaking sanitary sewer, groundwater flow direction and velocity will be re-evaluated and incorporated into the design of the Preferred Remedial Alternative".

If you have any questions concerning any of these comments, please call me at (757) 873-1442 ext. 28

Sincerely,



Donna Caldwell
Activity Manager

cc:

Ms. Lora Fly, NAVFAC Mid Atlantic

Ms. Mary Cooke, USEPA Region III

Ms. Jamie Butler, CH2M HILL