

9/13/06-01004

CH2M HILL

5700 Cleveland Street

Suite 101

Virginia Beach, VA 23462

Tel 757.671.8311

Fax 757.497.6885



September 13, 2006

Mr. Jeffrey Boylan
NPL/BRAC
Federal Facilities Branch (3HS11)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Response to Comments, *Draft Final Explanation of Significant Difference for Site 12: Exchange Laundry/Dry Cleaning Facility*, Naval Amphibious Base Little Creek, Virginia Beach, Virginia

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received from USEPA on the *Draft Final Explanation of Significant Difference for Site 12: Exchange Laundry/Dry Cleaning Facility* at Naval Amphibious Base Little Creek, Virginia Beach, Virginia:

1. General Overall Comment: Section 117 of CERCLA, entitled "Public Participation," requires us to publish an explanation if remedial action taken differs significantly from the final remedial action plan, i.e., the ROD. Like the proposed plan and ROD, explanations of significant differences are intended for the general public. To the extent possible, some sentences and technical words and phrases may be difficult to understand and could be rewritten for the general public. Please see the suggested changes in the following comments.

Response: Noted.

2. Introduction and Statement of Purpose Section 1, 3rd paragraph: Current language reads "Land use controls (LUCs) have been imposed on Site 12, for ground water and site use, until conditions permit unlimited use and unrestricted exposure." Suggested changes are "Land use controls (LUCs) have been imposed on Site 12 to prevent exposure to contaminated groundwater.", or "Land use controls (LUCs) have been imposed on Site 12 to prevent withdrawal of contaminated groundwater."

Response: The text has been revised to state "Land Use Controls (LUCs) have been imposed on Site 12 to prevent exposure to VOCs in groundwater".

3. Introduction and Statement of Purpose Section 1, 4th paragraph: Current language reads "The change in the selected remedy as presented in the ROD and addressed in this ESD is the elimination of the in-situ chemical technology component and modification of groundwater monitoring for select metals to be identified in the remedial action work plan." Suggested change is "The Navy and EPA, in consultation with VDEQ, are eliminating one component of

the remedy, in-situ chemical oxidation, as well as groundwater monitoring of metals associated with in-situ chemical oxidation.”

Response: The text has been revised accordingly.

4. Introduction and Statement of Purpose Section 1, 4th paragraph: Please explain “Source zone.” For example, could you explain the source zone, as we did in the ROD (p. 1-2), as an area of ground water with high concentrations of VOCs?

Response: The text has been revised to replace the phrase “source zone” to “area of highest VOC concentration”.

5. Introduction and Statement of Purpose Section 1, 4th paragraph 1st bullet: Suggested change is “Recent studies of Site 12 groundwater indicate that in-situ chemical oxidation would require 11 times more oxidizing agent than originally estimated in the ROD (80,500 pounds as opposed to 7,300 pounds);”

Response: The text has been revised accordingly.

6. Introduction and Statement of Purpose Section 1, 4th paragraph 2nd bullet: Suggested change is “Injection of additional oxidizing agent may cause increased metals concentrations in ground water to toxic levels, due to impurities inherent to the oxidizing agent, and due to dissolution of metals naturally present in the aquifer soils; and”

Response: In order to confirm metals toxicity levels, a quantitative risk evaluation utilizing toxicity information would be required. Therefore no text revision is recommended.

7. Introduction and Statement of Purpose Section 1, 4th paragraph 3rd bullet: Suggested change is “The groundwater monitoring program will need only to address metals released into groundwater by the ERD component of the selected remedy.”

Response: The text has been revised accordingly.

8. Basis for the Document Section 3, 1st paragraph: Please add some language stating “the ROD originally estimated that 7,300 lbs of sodium permanganate would be required.”

Response: The last sentence of Section 3, 1st paragraph has been revised to state; “It was determined that 80,500 lbs of 40% sodium permanganate would be required to overcome the NOD of the aquifer and effectively treat VOCs whereas only 7,300 lbs of sodium permanganate were estimated in the ROD.”.

9. Basis for the Document Section 3, 3rd paragraph, last sentence: Please delete “as a component of chemical oxidation” from the sentence. The monitoring program will be modified to reflect elimination of ISCO and ERD as the remaining component of the selected remedy.

Response: The text has been revised accordingly.

If you have any questions concerning these comments, please give me a call at (757) 671-8311, ext 439.

Sincerely,



Jamie Butler,

Project Manager

cc: Mr. Paul Herman/VDEQ
Mr. Scott Park/NAVFAC Mid Atlantic
Ms. Bonnie Capito/NAVFAC Atlantic