



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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September 25, 2008

Mr. Scott Park
NAVFAC Mid-Lant
9742 Maryland Ave
Code EV 3, Bldg N-26, Rm 3208
Norfolk, Virginia 23511-3095

Subject: Naval Amphibious Base Little Creek
*Draft Technical Memorandum – Work Plan for Pre-Feasibility Study Sediment Sampling
SWMU 3, Pier 10 Sandblast Yard*

Dear Mr. Park:

The Virginia Department of Environmental Quality (VDEQ), Office of Federal Facilities Restoration has reviewed the *Draft Technical Memorandum – Work Plan for Pre-Feasibility Study Sediment Sampling – SWMU 3, Pier 10 Sandblast Yard* dated September 2008. Based on the VDEQ review we offer the following comments:

1. Site History: Please specify building CB125 is not near SWMU 3 but located near SMWU 7 and is not depicted on Figure 2.
2. ABM Delineation Activities: If ABM is present in the study area samples will they be analyzed for metals and perhaps PAHs? If not, they should be, as we are trying to develop a PRG that will be used to delineate the extent of contamination. The 5th sentence seems to require a minimum of 3 transects in each study area (northeast and south west) in order to be able to follow the process the sentence defines. If a sample collected along transect J exceeds 1% ABM, then additional samples are to be collected from two consecutive locations along adjacent transects (a sample from K and a sample from L). Figure 4 should be modified to show a 3rd transect, transect L, in the northeast area.
3. Treatability Testing – Metal Stabilization: How is the 7-day curing period accomplished in the lab? What does it entail? Is it supposed to mirror the conditions expected in the field? The analysis of the admixture should include phosphorous as it is a nutrient that is monitored fairly closely in most watersheds and especially so in the Chesapeake Bay watershed.

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4. Data Quality Control: EPA Region III's Data Validation Procedures recommend data used for treatability studies be subjected to a Level M2 Organic Review and a Level IM-1 Inorganic Review. And, since the data to be generated will be used to determine the cost of disposal and treatment options, VDEQ feels it would be beneficial to have an independent 3rd party review the data for method non-conformances, usability, anomalous results, reasonableness, etc.

If you have any questions concerning these comments, please give me a call at (804) 698-4464.

Sincerely,



Paul E. Herman, P.E.
Remediation Project Manager

cc: NABLC Tier 1 (electronic copy)
NABLC Correspondence File
Milt Johnston, VDEQ-TRO