



DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT ST
NORFOLK, VA 23511-2699

08.01-5/3/99-0075

TELEPHONE NO

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IN REPLY REFER TO

5090
18221:RMJ:cag

MAY 03 1999

U.S. Environmental Protection Agency
Region III
Federal Facilities Branch
Attn: Mr. Harry Harbold (3HS50)
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Re: Areas of Concern in the FFA, Naval Base, Norfolk,
Virginia

Dear Mr. Harbold:

The Federal Facilities Agreement for the Norfolk Naval Base, signed by EPA on February 18, 1999, listed eight Areas of Concern (AOC). The FFA requires that the Project Managers evaluate these AOCs and make a determination which ones will proceed to the Site Screening Process (SSP) as Site Screening Areas (SSAs). The final determination is to be made within 120 days of the effective date of the FFA and includes a 30 day review period by EPA. A provision is included for extending this deadline if the parties agree.

Documentation and sampling of each of these AOCs were previously provided and discussed at the last partnering meeting on March 16, 1999. Based on the documentation and discussions, the Navy proposes to categorize the AOCs as described below.

For the following AOCs, proceed to the SSP as SSAs:

- AOC 2 (SWMUs 9/10) MAC Area
- AOC 4 (SWMU 14) Q-50 Accumulation Area
- AOC 5 (SWMU 38) CD Area Behind Compost Yard

For the following AOCs, classify as requiring no further action and be closed-out with a brief report:

- AOC 1 (SWMUs 02/03) Building Z-309
- AOC 7 (SWMU 40) MAC-603 Pits
- AOC 8 (SWMU 41) Disposal Area, CA-99 Golf Course
- AOC 3 (SWMU 42) CEP 201 Area (Note: this SWMU is being separated from the other SWMUs in AOC 3)

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For the remainder of the SWMUs in AOC 3 (SWMUs 28, 32, 33, 34, and 35), and AOC 6 (SWMU 39), the Navy requests that the time for categorization be extended until December 1999 to allow for further analysis as follows:

AOC 3 (SWMUs 28, 32, 33, 34, and 35) CEP Area: There is sufficient field data to conclude that, provided the area remains industrial, no further action will be required. However, the field data does not pass all residential screening criteria. Therefore, either institutional control will need to be established or further evaluation of the data to determine if residential scenario can be supported. The Navy proposes to provide further documentation in the form of background studies and/or risk assessment data. If further analysis indicates that a residential scenario is acceptable at the site, closeout documentation will be provided. If institutional controls are deemed necessary, the CERCLA process will be carried out.

AOC 6 (SWMU 39) Open Dump and Disposal Area at Boundary of Camp Allen Landfill: The Navy proposes to review existing documents and possibly take samples at AOC 6 for screening purposes. Once the samples are analyzed, the Navy will propose classification of the AOC 6 based on the results.

Please review these proposed categorizations and provide response and comments by May 28, 1999. If you have any questions concerning this request, please contact the Remedial Project Manager, Mr. Randy Jackson, at (757) 322-4587.

Sincerely,



N. M. JOHNSON, P.E.
Head
Installation Restoration Section
(North)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Re: Areas of Concern in the FFA, Naval Base, Norfolk,
Virginia

Copy to:

COMNAVBASE Norfolk (Ms. Dianne Bailey, N45)

VDEQ (Mr. Devlin Harris)

Administrative Record File (Naval Base, Norfolk)

CH2M Hill (Mr. Mike Tilchin)