



COMMONWEALTH of VIRGINIA

CHESAPEAKE BAY LOCAL ASSISTANCE DEPARTMENT

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May 24, 1994

Ms. Lisa A. Ellis
Project Officer
Department of Environmental Quality
Federal Facilities Program
629 East Main Street
Richmond, Virginia 23219

Re: Final Remedial Investigation/Feasibility Study, Q Area Drum Storage Yard, Norfolk Naval Base, Norfolk, Virginia

Dear Ms. Ellis:

We have reviewed the project referenced above for consistency with the Chesapeake Bay Preservation Area (CBPA) Ordinance adopted by the City of Norfolk.

Norfolk is one of several cities to integrate their CBPA program with the requirements for the Environmental Protection Agency (EPA) stormwater discharge permit under the NPDES program. In doing so, the City has applied the general performance standards required under the Chesapeake Bay Preservation Area Designation and Management Regulations (VR 173-02-01) city-wide. These standards pertain to the minimization of land disturbance, preservation of indigenous vegetation, following the local erosion and sediment control ordinance for projects disturbing more than 2,500 square feet and stormwater management.

Although this project is not located within the City's formal CBPA, the city-wide performance standards will apply. Any of the remedial action alternatives involving land disturbance should be consistent with the erosion and sediment control standards. In addition, Alternative 2, which would involve the placement of an asphalt cap, should meet the stormwater management standard. Since the study area is currently covered by gravel, Alternative 2 would

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be classified as "redevelopment." Redevelopment projects should provide a 10% reduction of nonpoint source pollution in runoff compared to the existing runoff load from the site. The 10% reduction can be achieved either through the use of structural Best Management Practices or by revegetating portions of the study area that were previously covered by gravel.

We hope you find these comments helpful. If we can be of further assistance, please call us at 1-800-CHES-BAY.

Sincerely,



Michele Carter
Civil Engineer

c: Mr. Darryl M. Glover

eis:sfund.nnb