

**Baker**

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Commander Atlantic Division  
Naval Facilities Engineering Command  
1510 Gilbert Street, Building N-26  
Norfolk, Virginia 23511-2699

Attn: Mr. David M. Forsythe, P.E.  
Code 18224

Re: Contract 62470-89-D-4814  
Navy CLEAN, District III  
Contract Task Order (CTO) 0138  
CD Landfill RI/FS, Naval Base, Norfolk, Virginia  
Response to Navy Comments on Draft FS Report

Dear Mr. Forsythe:

Baker Environmental, Inc. (Baker) is pleased to submit our response to comments by LANTDIV Code 18 and COMNAVBASE on the Draft Feasibility Study Report (provided as Attachment A).

Should you have any questions concerning the attached responses, please call me at (412) 269-2032 or Mr. Gordon Ruggaber at (412) 269-4697.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Jeri L. Trageser, P.G.  
Project Manager

JLT/lq

Attachment

cc: Ms. Lee Anne Rapp, LANTDIV Code 18312 (letter only)  
Mr. Rollie Burford, LANTDIV Code 02112 (letter only)



A Total Quality Corporation

## ATTACHMENT A

### RESPONSE TO NAVY COMMENTS CD LANDFILL, NAVAL BASE, NORFOLK, VIRGINIA DRAFT FEASIBILITY STUDY REPORT

#### Code 18 Comments

1. Page 1-4, Last sentence is the same as a statement that was removed from the RI report. Delete.

Response: The last sentence which refers to the batteries has been deleted from the text.

2. Page 1-11, Fourth line from bottom of page indicates that "in general no hot spots were identified. Clarify, either there was or there was not. If there was, describe areas in detail.

Response: This sentence will be revised to read "However, no "hot spots" (i.e., discrete areas of contaminated soil which are potential sources of groundwater/surface water contamination) were identified for possible remediation (i.e., evaluation of hot spot remedial alternatives in the FS)."

3. Page 1-12, Second paragraph discusses subsurface soil contamination. The description seems written about a spill area instead of a disposal area. Clarify what "subsurface soils" are composed of.

Response: This sentence will be revised to read "Analytical results indicate subsurface soils (i.e., fill soils located beneath the top vegetative layer in potential contact with buried debris) to be impacted by disposal activities."

4. Table 2-1a, First item under comments should include either a list of the contaminants/chemicals that this applies to or reference a table of the same.

Response: The table will be revised to state that no contaminants were detected in the Yorktown Aquifer in excess of the MCLs except for iron and manganese, which exceeded their respective secondary MCLs in the two Yorktown wells. However, the iron and manganese concentrations are elevated throughout the base and are most likely not site-related. With respect to long-term groundwater monitoring of the Yorktown Aquifer, all MCLs are relevant and appropriate since they would be used as benchmarks to which sampling results would be compared.

5. Table 2-2c, Comment for Virginia Solid Waste Management Regulations indicates that the landfill has been "closed" when it has never been officially closed, but ceased operations in 1988.

Response: The ARAR Table will be revised to include the closure and post-closure requirements under both the Virginia Hazardous Waste Management and Solid Waste Management Regulations. The VA DEQ has indicated that the Virginia Hazardous Waste closure and post-closure requirements are relevant and appropriate to the permitted part of the landfill since disposal of EP Toxic wastes for cadmium (D006) occurred after November 1980.

The Virginia Solid Waste closure and post-closure requirements are relevant and appropriate to the unpermitted part of the landfill, which operated from 1974 to 1979. Table 2-2c will be revised accordingly to indicate this information.

6. Page 3-3, Second paragraph should include a comment that the base Real Estate Mapping could designate the area as restricted use (different from Master Plan).

Response: Text will be amended to read, "However, there is currently no official land use designation for the site. Base Real Estate Mapping could designate the area 'restricted use' which would prohibit future residential use."

7. Page 3-3, Last paragraph, if capping is kept in the Feasibility Study then the primary purpose statement here should be prefaced by a comment noting no risk to human health.

Response: It is stated on page 3-4 that "results of the human health risk assessment indicate that the risks associated with exposure to the surface soils are within acceptable levels." The objective of the 1-foot soil cap, which has been added to the FS, is simply to provide an added buffer between the wastes and the surface. The soil cap would provide additional protection to human and terrestrial and aquatic ecological receptors by minimizing the potential for the landfill contents to become exposed due to erosion.

8. Page 3-4, First paragraph indicates releases likely due to groundwater fluctuations. We should indicate that certain inorganics are less mobile in the soils than other contaminants.

Response: The sentence to which the comment refers was written for organic contaminants that are more mobile than inorganic contaminants; such as, the chlorobenzene detected in the shallow groundwater in the eastern portion of the landfill. This sentence will be revised to reflect this point.

9. Table 3-3, Under Institutional Controls, the screening comment indicates that deed restrictions are not applicable because the base is not on the closure list. Base Closure listing is not the sole basis of whether or not to place deed restrictions (see previous comment).

Response: Agreed, however, deed restrictions would only be necessary if the property is sold. Revisions to the Base Master Plan (without deed restrictions) may be sufficient as institutional controls. This approach is being used for Marine Corps Base, Camp Lejeune in agreement with EPA Region IV and the North Carolina Department of Environment, Health, and Natural Resources. Deed restrictions can certainly be added to the Institutional Controls alternative if the Navy feels it is appropriate for CD Landfill.

10. General - Based upon comments provided by the B-TAG review and the VDEQ ecological comments (exceedence of screening values), sediment and surface water alternatives may be included. Upcoming discussions should clarify the need to include these.

Response: Alternatives for surface water and sediment protection have been added to the FS as follows:

- Alternative SD-2: Sediment Removal and Off-Site Disposal
- Alternative GW-3: Groundwater Extraction (to prevent discharge to surface water)

COMNAVBASE Comments

1. Page 1-8, Last two sentences reference NEESA documents and protocols. Add a qualification statement that NEESA is now known as NFESC.

Response: Text has been amended to read, "Please note that NEESA is now known as Naval Facilities Engineering Service Center (NFESC).

2. Page 1-10, Figure 1-4, Do we need a figure that shows where the cross-section AA crosses the CD Landfill?

Response: Figure 1-4 will be modified to include an insert showing the location of the cross-section with respect to the site.

3. Page 2-4, Section 2.3.1 - Soils. There is no mention in this section of the future child resident risk (with an HI of 2.4) from ingesting subsurface soils, yet under 2.3.2 - Surface water/Sediments - the HI of 3.3 was mentioned. Why wasn't the HI of 2.4 mentioned here?

Response: This section will be revised to clearly summarize the results of the revised Baseline Risk Assessment for the various exposure scenarios.

4. Page 2-2c, Potential VA Action-Specific ARARs (sheet 1 of 2). Shouldn't the necessary regulations appear above the four actions listed on this page? All of the other regulations are listed as a subtitle of the action.

Response: Table 2-2c will be revised to show the appropriate regulations above the various actions.

5. Page 3-9, Section 3.2.2.2.2 Public Education. Last paragraph, environmental is spelled wrong.

Response: "Environment" will be changed to "environmental."