

**Response to Comments
Engineering Evaluation/Cost Analysis
For Contaminated Sediment in the Pond Area
Site 22
Camp Allen Salvage Yard
Naval Station Norfolk, Norfolk, Virginia**

Summary of Response to Comments from USEPA on Draft EE/CA

The Draft Engineering Evaluation/Cost Analysis (EE/CA) for Contaminated Sediment in the Pond Area at Site 22 located adjacent to the Camp Allen Salvage Yard at Naval Station Norfolk in Norfolk, VA was submitted for review on February 10, 2003. The following comments were provided by USEPA Region III, in an email dated March 27, 2003. The Draft Final EE/CA will be revised to incorporate these comments as follows:

1. **Comment:** 2.2.6: Is there data/documentation to support the statements made in this section? Where is it located (reference)?

Response: Information provided in Section 2.2.6 concerning ground water quality is referenced in the Final Remedial Investigation/Risk Assessment Report for Camp Allen Salvage Yard, Naval Station Norfolk, Norfolk, Virginia, Volume I of II Text, page 2-8, Section 2.7.2, Groundwater Quality. The original source for this information was obtained from the following source: Siudyla, E. A., May, A. E., and Hawthorne, D. W. 1981, Groundwater Resources of the Four Cities Area, Virginia (Norfolk, Virginia Beach, Portsmouth, Chesapeake): Virginia State Water Control Board Planning Bulletin 331, p. 168. The document provides that due to water quality issues, hydrogeologic and sedimentary characteristics, the water table aquifer is restricted from use as a public drinking water supply. Specific information from this document is provided in the attachment.

2. **Comment:** 2.2.6: Sentence 6: Water is used for non-potable uses? delete "drinking water."

Response: The sentence will be changed to state, "Generally, the water table aquifer is not suitable for domestic use, but it used for non-potable uses such as lawn watering."

3. **Comment:** 2.2.6: Sentence 7: As discussed previously, EPA does not recognize the Norfolk restrictions as being an enforceable restriction/ordinance.

Response: This intent of this sentence is not to imply that the ordinance is enforceable, it is a general statement regarding the quality of the water table aquifer.

4. **Comment:** 2.2.7: Bousch Creek is an ecological feature associated with CASY. Please clarify why there is no connection between the CASY pond and the creek. Past (FS) and future (PRAP) documents may raise some concerns. (i.e., connection has been cleaned as part of CASY cover work, sediments will be covered? no longer an impact). Explain the origin of the pond, also. The public might read this as ? This is a pond? Has little fish, frogs, bird food? What do they mean no eco?

Response: The revised EE/CA will note while there is a connection between the CASY pond and Bousch Creek, via the storm sewer that crosses the CASY. The text will also note that this storm sewer has been cleaned and repaired, and the pond removal action would minimize the potential for migration of contaminated sediments from the site to Bousch Creek.

The text will be revised to note that the pond was originally built to serve as a stormwater retention pond, and the small size and location of the pond provides poor quality habitat for both terrestrial and aquatic receptors. This information is discussed further on page 3-4, Section 3.3.1. The last sentence of section 2.2.7 will be changed to state, "The pond area adjacent to the CASY offers limited terrestrial habitat and minimal ecological features. Presently the pond area supports limited aquatic wildlife species, though it offers extremely poor habitat due to its small size, relative isolation from other ecological features, and proximity to developed areas."

5. **Comment:** 2.2.9, Paragraph 5/6: Clarify why, if a removal was performed to address metals, an additional action was necessary to "remove" or cover the contaminated soil at CASY.

Response: The EE/CA will be revised to state that the 2001 Hot Spot removal action of 16,000 cubic yards of metals contaminated soil was an interim measure. As part of the confirmation sampling associated with the 2001 removal action, more extensive and widespread metals contamination was identified at Site 22. Based on this additional data, the estimated costs to remove the remainder of the metals contaminated soil, and the Navy's plans for recreational development at the site, the decision was made in 2002 to place the one-foot soil cover over the site to reduce potential human health risks associated with exposure to the soils.

A sentence at the beginning of the sixth paragraph of 2.2.9 will be added that states, "The EE/CA concluded that Alternative 2, On-Site Containment, be implemented for a non-time critical removal action at the CASY."

6. **Comment:** 5.2: This section needs to be re-worked. MOAs and LUCAPs no longer exist. We are now working with RD documents and RSIPs.

Response: The text will be revised and will reflect current Navy land use control policy. The third paragraph of Section 5.3, starting at the third sentence, will be revised to delete references to MOA, LUCAPs, and LUCIPs as follows: "Under this alternative, the site would be given a land use category in a base master plan or similar planning document, that would restrict invasive construction activities within the pond area. This alternative would also require the use of a LUC Remedial Design (RD) to ensure that the land use controls are periodically inspected and maintained".