

Reisch, Tim

To: TODD RICHARDSON
 Durwood Willis (E-mail); Paul Kohler (E-mail); Paul Leonard (E-mail); Schirmer, Bob G.;
 Rakowski, Paul A.; Harlow, Jeff; Neill, Carolyn; Barnett, Cherryl F.

Subject: RE: Community Concerns

Todd,

As we have discussed on the phone, and I mentioned during our site visit, there are members of the community located in a neighborhood that borders St. Juliens Creek who want deep water access to the Elizabeth River for their boats. That is the basis for their participation in the RAB. While the Navy encourages their participation, the RAB will continue to be a forum to inform the local community of the actions/progress of the SJCA Installation Restoration Program and not serve as an open debate on how to get the Navy, or other Federal agency, to pay for actions beyond the scope of CERCLA. With that in mind, the following is provided:

1. The sunken bridge is contributing to the accumulation of potentially contaminated sediment upstream from the bridge

Historic maps and surveys of SJCA show a rail line (Virginia Railway & Power Co.) crossing St. Juliens Creek and what is now the St. Juliens Creek Annex. The rail line was constructed prior to 1917, when the Navy purchased the property to the east of the line. In 1929, the Navy purchased the property to the west of the rail line. In these land acquisitions, the Navy never purchased the property on which the rail line was constructed. The former location of the rail line, Craddock Street, is apparently an easement and still not Navy property. Review of historical maps, surveys, and aerial photography of this area, illustrate a narrow peninsula extending approximately 250 ft. into St. Juliens Creek (the Creek) from the south side. This feature was likely constructed to shorten the trussed span, approximately 100 ft., across the Creek onto what is now St. Juliens Creek Annex. The oldest aerial photography (1937) shows the remains of the trussed span, piles approximately every 10 ft. across the Creek. However, there is no evidence of the bridge structure itself. Review of later aerial photograph does not reveal any depositional areas in the channel where the bridge was allegedly "dropped" during the demolition of that structure.

There are no identified sources of Navy contamination upstream of the former rail line bridge; however, a private landfill was operated immediately adjacent to the Navy property just upstream of the former rail line location. The Navy considered taking legal action against the landfill operator in the early 1970s due to erosion and drainage problems caused by that operation. The closest Navy site to the former rail line is Landfill B. This landfill, used from the 1920s to the late 1940s, partially filled in a low lying area that is hydraulically connected to the Creek, and is directly east of the former rail line. The extensive RI underway for this landfill includes sediment sampling in the remaining low lying area at the former landfill, and into the Creek. The sediment sampling in the Creek was conducted at the discharge point of the landfill into the Creek, and at locations upstream and downstream. In addition, the Navy conducted "reference" sediment sampling in the Creek (upstream and downstream of the Landfill) as part of a background study. EPA, VDEQ, and BTAG assisted in determining the number and locations of these sediment sampling locations. If the results of the RI identifies site related sediment contamination and a potential risk from that contamination, the sediment in the Creek will be addressed in the FS.

This information was conveyed to the RAB; however, as several members of the RAB have already determined the required action (dredging of the Creek) they are looking to other sources to ensure their "environmental concerns" are properly addressed and they are provided boat access to the Elizabeth River.

2. Does/how does the Navy intend to address these potentially contaminated sediments in St. Juliens Creek?

The Navy will continue to follow the CERCLA process to address any contamination migrating from a Navy site into St. Juliens Creek. The draft RI for Landfill B, which address the Creek, is expected later this spring. With the results of the RI, the Navy will develop remedial alternatives in an FS to address any potential risks identified in the RI. Funding for a remedial design is programmed for FY-00; however, due to delays in implementing required RI fieldwork, it is unlikely that the RI & FS will be completed to a point to initiate this additional action.

3. Leachate from one of the landfills could be a continuing to contribute to the contamination of sediments into St. Juliens Creek.

media (surface soil, subsurface soil, surface water, sediments, groundwater (shallow and deep aquifers)) have been sampled to determine the nature and extent of contamination associated with Landfill B. This information is forthcoming in

an RI later this spring. The RI will also discuss the fate and transport of identified contaminants, and determine the risk posed by these contaminants to human and ecological receptors.

There was alleged dumping of dredge spoils from the Elizabeth River to wet land areas surrounding St. Juliens Creek - potentially adding to the accumulation of contaminated sediments upstream from the sunken bridge. Comparisons of contaminant concentration levels to that of background could prove ineffective since a fair percentage of the contaminated sediments in the creek probably resulted from erosion of the "dumped" dredge spoils which were taken from an upstream portion of the Elizabeth River.

Review of aerial photography shows that a tributary of St. Juliens Creek (across the Creek from the Annex - not on current/former Navy property) was filled during the 1950s. This former tributary is approximately 3,500 ft. downstream of the former rail bridge. It appears that a dike was created at the mouth of the tributary, and the area behind the dike was filled with soil/sediment to reclaim land. An engineered drainage ditch was later constructed to route surface runoff from this area, and nearby locations, to the Creek. Later aerial photography reveal some sediment deposition at the confluence of the engineered drainage ditch and Creek. The material in this localized depositional area is likely the result from upstream soil erosion channeled to the Creek by the engineered ditch.

The reports of "alleged" dumping of dredge spoils into the Creek are unfounded as aerial photography illustrates that the Creek's banks and general appearance (other than filling in the tributary noted above) remains fairly consistent throughout the time period of available aerial photography (1937 - present). In addition, during the period of alleged dumping of dredge spoils into the Creek (by the Navy) the Navy was using all available dredge spoils for "land reclamation" at the northeast portion of the Annex. This is very evident by review of aerial photography, which supports the recorded accounts of facility operations in previous assessments of the Annex (IAS and RFA). During this period, the Norfolk Naval Shipyard (NNSY), located approximately 1 mile down-river of the Annex, was constructing a large dry-dock. The dredge spoils from the construction of this dry-dock, and other NNSY dredging projects during this era, were deposited at site at the confluence of Paradise Creek and the Elizabeth River; the location of this filling is NNSY IRP Site 3 which is currently under a remedial investigation. Additional documentation of this dredge/fill operation is contained in numerous NNSY IRP reports and evident in the aerial photography of NNSY.

The role/position of the State and Federal Natural Resource Trustees as related to the preservation/restoration of St. Juliens Creek.

The Navy's role as a Federal Natural Resource Trustee as related the Creek applies to ensure that actions taken in response to an identified and assessed CERCLA release are consistent to ensure the preservation of the conditions of the Creek.

The Navy will continue to address this issues as they arise during the RAB; however, the Navy will follow the CERCLA process to make future action determination at the St. Juliens Creek Annex sites. If you have any questions, or require additional information, please call.

Thanks
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-----Original Message-----

From: TODD RICHARDSON [mailto:RICHARDSON.TODD@epamail.epa.gov]
Sent: Tuesday, March 28, 2000 5:15 PM
To: reischta@efdlant.navfac.navy.mil
Subject: Community Concerns

am:

There are several concerns that have been brought to my attention by members of the community (RAB). As you are probably aware, and as we have recently discussed, members of the RAB have expressed concerns related to the sunken bridge in St. Juliens Creek Annex.

I am aware, and have communicated to some members of the RAB, that several of these concerns are beyond the scope of responsibility of EPA or that of the Navy. However, I thought that at a minimum, some time could be set aside during the RAB meetings to explore these issues.

As I understand the specific concerns are as follows:

1. The sunken bridge is contributing to the accumulation of potentially contaminated sediment upstream from the bridge
2. Does/how does the Navy intend to address these potentially contaminated sediments in St. Juliens Creek?
3. Leachate from one of the landfills could be continuing to contribute to the contamination of sediments into St. Juliens Creek.
4. There was alleged dumping of dredge spoils from the Elizabeth River into wet land areas surrounding St. Juliens Creek - potentially adding to the accumulation of contaminated sediments upstream from the sunken bridge. Comparisons of contaminant concentration levels to that of background could prove ineffective since a fair percentage of the contaminated sediments in the creek probably resulted from erosion of the "dumped" dredge spoils which were taken from an upstream portion of the Elizabeth River.
5. The role/position of the State and Federal Natural Resource Trustees as related to the preservation/restoration of St. Juliens Creek.

When you have an opportunity, give me a call or reply by e-mail, and let me know what you think.

Thanks,
Todd