006141 - Permits, Closure
Fort Belvoir Main Base
VA7213720082
Approval / Determination

# COMMONWEALTH of VIRGINIA

*DEPARTMENT OF ENVIRONMENTAL QUALITY*

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Secretary of Natural Resources

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September 25, 2003

Kevin W. Tate
Lieutenant Colonel, US Army
U.S. Army Garrison, Fort Belvoir
Director of Public Works and Logistics
9430 Jackson Loop, Suite 100
Fort Belvoir, Virginia 22060-5116

Re: U. S. Army Garrison, Fort Belvoir
Closure Approval Open Burning/Open Detonation Unit at Range T6-Alpha (OB/OD Unit), (X01/CC/NN)[1]
EPA ID Number VA7213720082

Dear Lieutenant Colonel Tate:

The Department of Environmental Quality's (DEQ) Office of Waste Permitting (OWP) received the Closure Report (Report) for the OB/OD Unit at Range T6-Alpha at Fort Belvoir dated December 31, 2000, and revisions submitted on January 22, 2002, and June 4, 2003. Also included were the certifications of closure.

On July 17, 2002, the DEQ sent a letter to Fort Belvoir stating that while reviewing the Report, it was noted that the facility performed the appropriate risk characterization for on-site constituents of concern (COCs) based on present and future commercial/industrial exposure scenarios. Therefore, based on these submittals, the facility appears to have demonstrated compliance with clean closure performance standards based on industrial/commercial risk exposure scenario for soils. To achieve restricted closure in accordance with *Guidelines for Developing Health-Based Cleanup Goals Using Risk Assessment at a Hazardous Waste Site Activity for Restricted Industrial Use,* Fort Belvoir was requested to complete and submit a Notice of Use Limitation (NUL) for the site and a new owner/operator and PE certifications. The DEQ requested the NUL and new certifications by letters dated August 29, 2002, and September 9, 2002.

By letter dated November 27, 2002, Fort Belvoir submitted the NUL. On December 12, 2002, the Department sent a Notice of Deficiency (NOD) to Fort Belvoir. Fort Belvoir requested extensions to submit revised language and survey plat on January 9, 2003 and March 7, 2003. The Department granted the extensions on January 23, 2003 and March 12, 2003.

On April 28, 2003, the Department received the revised NUL and the Department sent an acknowledgment on April 29, 2003. After reviewing the NUL and the Report, it was noted that the language stated in the NUL was different from the language in the Report. The Department requested that Fort Belvoir either make changes to the language in the NUL or the Report. Fort Belvoir stated that it was easier to revise the Report. Therefore, on June 4, 2003, Fort Belvoir sent the revised Report, including new certifications to the Department for review. Between June 4, 2003 and August 21, 2003, several telephone conversations took place between Fort Belvoir's consultant Dewberry and Davis and the Department staff to discuss the NUL and the closure activity.

On July 11, 2003, Laura Derby, Compliance Inspector of the Northern Virginia Regional office (NVRO) conducted a closure site verification inspection at Fort Belvoir to determine if the regulated unit had been closed as required by the approved closure plan. Ms. Derby stated that the area where the pit used to be had a lot of rather hearty vegetation and a ~ 7' x 10' area that had some gravel fill. No vegetation was growing in the gravel area with the exception of some vines running across the area. At the time of inspection, there was not any substantial water (e.g. puddles or a pond) in the unit including the gravel area and it had rained the night before. The earthen berm around the entire area was still present.

The OWP staff reviewed the closure plan and the Report to concur that the closure activity conducted by Fort Belvoir was in compliance with the approved closure plan. It was discovered that in the closure plan, Fort Belvoir stated that clean soil was to be used as fill in the OB/OD Unit; however, gravel was used instead, as noted by Ms. Derby. In order for Fort Belvoir to be in compliance with the approved closure plan, the Department requested that Fort Belvoir remove the gravel and fill the OB/OD Unit with clean soil. Fort Belvoir agreed to remove the gravel and replace the gravel with clean soil.

On August 21, 2003, Fort Belvoir submitted pictures indicating that 15 yards of topsoil was placed on the OB/OD Unit. After backfilling the OB/OD Unit, grass seed and straw were placed over the topsoil.

The result of the closure verification inspection and the submitted information has been reviewed. Based on the information submitted, closure to industrial use standard was achieved for the OB/OD Unit at Range T6-Alpha in accordance with the approved closure plan. Therefore, the DEQ concurs that closure to industrial/commercial use for this OB/OD Unit has been achieved and approves the closure certifications and closure report, as amended. Please insure that the use of this site complies with the NUL condition of this approved closure.

Please note, however, that the U.S. Environmental Protection Agency retains the authority to address possible corrective action of past or future releases pursuant to the Hazardous and Solid Waste Amendments (HSWA) of RCRA of 1984.

If you have any questions regarding this letter, please contact Julia M. King-Collins, Environmental Engineer Senior, of my staff at (804) 698-4237 or she can be reached by Internet at jmking-col@deq.state.va.us.

Sincerely,

Leslie A Romanchik

for Robert G. Burnley

c: Joanne Cassidy (3WC21), EPA Region III
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