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United States Department of the Interior

NATIONAL PARK SERVICE
COLONIAL NATIONAL HISTORICAL PARK
POST OFFICE BOX 210
YORKTOWN, VIRGINIA 23690

IN REPLY REFER TO:

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May 25, 1989

Mr. Scott Park
Norfolk Environmental Coordinator
Naval Supply Center
Building W143
Norfolk, Virginia 23512-5000

Dear Mr. Park:

We have completed our review of the "Initial Assessment Study and Draft Remedial Investigation Interim Report for the Naval Supply Center (Norfolk) Cheatham Annex and Yorktown Fuels Division Annex. We want to express our appreciation in being included on the Technical Review Committee. We believe that the data and interpretations generated from this project will be an important addition to the area's and Colonial NHP's water quality inventory and monitoring efforts.

The National Park Service, Water Resource Division scientists have reviewed the draft report. The following comments reflect the concerns and recommendations of the National Park Service:

General Comments

The reviewers found the documents well-organized and well-written. The sampling plans are generally well thought out, and should reveal the nature and extent of any pollution problems which may have resulted from the operation of the facilities investigated.

Specific Comments

1. Initial Assessment Study of Naval Supply Center (Norfolk), Cheatham Annex, and Yorktown Fuels Division.

Page 2-10, part 2.2.3 - Sites Not Recommended for Confirmation Study: We are somewhat concerned about the decision to drop site 7, described on page 2-14, from further study. While the best information available to the investigators that prepared the IAS indicated that the wastes deposited at this site were non-hazardous or inert, there apparently was scant information to indicate what exactly was deposited at this site. Since this site served as a repository for wastes from a municipality and a chemical company we think there is a fair chance that chemicals



associated with household products and industrial processes could have been deposited at site 7. Given the uncertainty about the type of waste deposited at site 7, and that the site appears to be in an environmentally sensitive location in relation to the York River, it would seem prudent to conduct follow-up investigations.

Page A-1, Appendix A - Agencies Contacted During the IAS: Was it perhaps an oversight that the Virginia Institute of Marine Science was not contacted? Could this be the reason that there is no species list for estuarine and marine invertebrates listed in the appendix? We note that this area is a very important nursery area for blue crabs and oysters.

2. Draft Remedial Investigation Interim Report Naval Supply Center (Norfolk) Yorktown Fuels Division, Yorktown.

Pages 5-3 and -4, part 5.2.3 - Biota Sampling Program: As the biota sampling program is presented, the course of study would first assess species diversity and distribution and then, depending on the findings of the biota sampling program, proceed to conduct "some type of toxicological testing". We recommend that toxicological studies be conducted at the time of the biota sampling program for the following reasons: (1) if the expected biota are present, they could be suffering from a non-discernable chronic effect of a toxic contaminant and; (2) if the biota are absent, we cannot prove that a toxic contaminant eliminated them.

Page 5 - 6, 1st full paragraph, 4th sentence: What procedures and species will be used for the ambient toxicity testing water?

3. Draft Remedial Investigation Interim Report Naval Supply Center (Norfolk) Cheatham Annex.

Page 4-17, part 4.2.2 - Site 9, Transformer Storage Area: Although PCB soil contamination at this site was found to be below levels that require remedial action, we are concerned about the recommendation on Page 6-2 that this site be excluded from further study efforts. Monitoring wells should be installed at this site to determine the extent, if any, of ground-water contamination.

Page 5-8, 1st paragraph, last sentence: We would like to see a description of the procedures that will be used for the toxicity testing.

Conclusions

We also recommend that the U.S. Fish and Wildlife Service, Environmental Assessment Division, White Marsh, VA.; the Virginia Marine Resources Commission, Newport News, VA.; the Virginia Institute of Marine Science; and VPI & SU, Virginia Water Resources Research Center, Blacksburg, VA. be afforded the opportunity to comment and receive all final reports and investigations. We have included an article on the statewide role of VPI's, Water Center.



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We look forward to participating in the future studies involved in this project. We are prepared for our staff and the NPS Water Resources Division to participate in future reviews as the final report and protocols are prepared, and studies conducted. If you have any questions please contact Chuck Rafkind, Natural Resource Specialist at 898-3400.

Sincerely,

David L. Moffitt
Superintendent

Enclosure

- cc: WRD - Ponce
- MARO - Jope
- COLO - Rafkind