

9/22/08 - 02291

CH2M HILL
5700 Cleveland Street
Suite 101
Virginia Beach, VA 23462
Tel 757.518.9666
Fax 757.497.6885



September 22, 2008

370301.SP.SP

Mr. Rob Thomson, P.E., R.E.M.
Office of Federal Facility Remediation
United States Environmental Protection Agency (EPA), Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Response to VDEQ Comments on *Draft Site Management Plan, Fiscal Years 2009-2010 (Draft SMP) for Cheatham Annex, Williamsburg, Virginia.*

Dear Mr. Thomson,

On behalf of the U.S. Department of the Navy's Naval Facilities Engineering Command (NAVFAC), this letter is in response to your August 13, 2008 comments regarding the subject document. Comments are presented, shown in italics, followed by Navy's responses. Furthermore, any additions to the text of the document are shown in blue text.

GENERAL COMMENT:

1. *The known extent of CAX (2,300 acres facility) has changed since the finalization of the Federal Facility Agreement (FFA) in 2005, with the Navy acquiring the adjacent former National Park Service (NPS) property. EPA's May 1998 Aerial Photographic Analysis (EPIC study) had identified potential areas of concern (AOCs) on NPS property related to (1) an apparent in-ground battery system, (2) abandoned drums, and (3) nitro-starch processing facilities. It is therefore, imperative that the SMP discuss the Navy's acquisition of the NPS property and delineate the complete current boundaries of CAX on a map. Additionally, EPA, VaDEQ, and the Navy need to discuss the identification/investigation of AOCs at the former NPS property in the immediate future.*

Response:

(a) The acquisition of the DOI property (known as the Cheatham Wilderness Area and sometimes referred to as the NPS) occurred prior to finalization of the FFA (March 2005); therefore, the acreage reflected in the FFA (2,300) includes the former 786-acre DOI property. This was verified by comparing the SMPs pre- and post-FFA. Prior to finalization of the CAX FFA, the SMP listed CAX's size as 1,578 acres. Following the final FFA, the CAX acreage in the SMP is 2,300, the same as that in the FFA. Although the sum of 786 acres and 1,578 acres is 2,364, it was assumed that the FFA contained the most accurate acreage for CAX (2,300).

(b) The SMP description for CAX will be revised to include information on the DOI property acquisition. The text will be revised as follows:

At inception, CAX occupied approximately 3,349 acres. Several portions of the original base have since been declared surplus and transferred to other government jurisdictions, including the National Park Service, the Commonwealth of Virginia, and York County. CAX is currently comprised of 2,300 acres and is divided into two separate parcels, with the larger parcel situated along the banks of the York River. Included in these 2,300 acres is the 786 acre former Department of Interior (DOI) property which was acquired by the Navy in 2005. The former DOI property is bordered to the east by the York river, to the north by Queen Creek and the Armed Forces Experimental Training Activity (AFETA) Camp Peary, to the west by the Williamsburg Battlefield and to the south by the King Creek and Naval Weapons Station Yorktown. Almost all of the activities at CAX (administration, training, maintenance, support, and housing) take place in the larger portion of the Installation. The smaller parcel is located south of the Colonial National Historic Parkway.

(c) The Navy agrees to a discussion of the former DOI property and has set aside time to discuss it, and Penniman in general, at the September 2008 Partnering meeting.

SPECIFIC COMMENTS:

2. *Section 2.1 – This section of the draft SMP needs to be updated to include the acquisition of the NPS property by the Navy. The total acreage of CAX also needs to be updated.*

Response: Please refer to responses 1(a) and (b).

3. *Section 3.2.9 – The description of the 5 Penniman sites should include a discussion of the designation of these 5 areas as Source Areas on the NPL.*

Response: While the Navy acknowledges that the Penniman AOCs were identified in the HRS scoring process, these AOCs are identified in the FFA as site screening areas in the SSP. The Navy believes adding HRS information to the write-up would be confusing as the SMP is a primary document associated with the FFA, which addresses these sites under CERCLA.

4. *Figures – Please include a figure delineating the current extent of CAX on a map.*

Response: Agreed that Figure 1-2 should reflect the current extent of CAX and it will be adjusted to include the former NPS property.

Sincerely,

CH2M HILL



Rebekah Klyukin
Project Manager

cc: Ms. Linda Cole/NAVFAC
Mr. Christopher Murray/NAVFAC
Mr. Robert Thomson/USEPA
Ms. Sue Haug/USEPA
Ms. Marlene Ivester & Ms. Cecilia Landin/CH2M HILL



LEGEND

-  Active RI/FS Sites (one or more media)
-  Active AOCs
-  No Further Action RI/FS Sites and AOCs
-  CAX Boundary

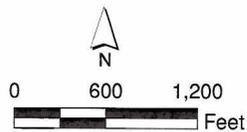


Figure 1-2
 Sites/AOC Locations and CERCLA Status
 Site Management Plan for FY 2009 to 2010
 Cheatham Annex
 Williamsburg, Virginia