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LETTER AND U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL  
QUALITY REGARDING DRAFT SITE INSPECTION SAMPLING AND ANALYSIS PLAN FOR  
PENNIMAN LAKE CHEATHAM ANNEX FISC WILLIAMSBURG VA

02/25/2011  
CH2M HILL



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

February 25, 2011

405134.PP.DF.01

Mr. Wade Smith  
Remedial Project Manager  
Virginia Department of Environmental Quality (VDEQ)  
Office of Remediation Programs  
P.O. Box 1105  
Richmond, Virginia 23218

Subject: Responses to Comments on *Draft Site Inspection Sampling and Analysis Plan (SAP), Penniman Lake, Naval Weapons Station Yorktown Cheatham Annex, Williamsburg, VA*. November 2010.

Dear Mr. Smith:

On behalf of the U.S. Department of the Navy's Naval Facilities Engineering Command Mid-Atlantic (NAVFAC MIDLANT), CH2M HILL has prepared this letter in response to your December 10, 2010 e-mail, providing comments for the subject document via track changes in the Word file. Comments received are shown in italics, followed by the Navy's response in blue.

- ❖ Comment #1 – *On the signature page, “To my knowledge, none of us ever sign the SAP”.*

Page 1.2.1 of the QAPP Manual states that “the purpose of the QAPP is to document the planned activities for environmental data collection...the planning should include ‘stakeholders’...”. NAVFAC, VDEQ, and EPA are considered stakeholders in the Penniman Lake Site Inspection. The signature page is the easiest way to document stakeholder approval. Other methods of approval, such as a letter or email, are also acceptable.

- ❖ Comment #2 – *In the Figure listing, Step 1 Decision Tree, Step 2 Decision Tree, Step 3 Decision Tree, Step 4 Decision Tree “Not yet included”.*

Figures 5-8 were inadvertently omitted from the pdf of the draft SAP and were submitted for Team review 12/17/10 after this omission was discovered. In an email dated 12/20/10, VDEQ had no additional comments. These figures will be included in the final SAP.

- ❖ Comment #3 – *SAP Worksheet#10, pg. 36, Please explain why the restrictions are not enforced. Why have restrictions if they are not enforced?*

There are signs posted at the lake informing recreational users that there is a catch-and-release fishing restriction due to PCB contamination; however, there is no one on-site checking coolers when the Jon boats return to the dock. The restriction exists, with the expectation that an individual will care about their health and self enforce. Nonetheless, there is no way to guarantee that 100% of the fish caught are re-released and the most conservative approach is to assume that there is some fish ingestion. The sentence has been revised as follows, in underlined text:

It is noted that catch-and-release fishing restrictions are in place for Penniman Lake; however, it is not enforced. There is no way to guarantee that 100% of the fish caught are re-released and the most conservative approach is to assume that there is some fish ingestion.

❖ Comment #3 – *Figures 5 through 8 are not included.*

Figures 5-8 were inadvertently omitted from the pdf of the draft SAP and were submitted for Team review 12/17/10 after this omission was discovered. In an email dated 12/20/10, VDEQ had no additional comments. These figures will be included in the final SAP.

In addition, all editorial changes have been accepted and retained and are not discussed on a case by case basis within this letter. If you have any questions or comments regarding the above response to comments, please feel free to contact me at 757-671-6258, or Marlene Ivester, at 757-873-1442 x41634.

Sincerely,

CH2M HILL



Katie Tippin  
Project Manager

cc: Ms. Krista Parra/NAVFAC MIDLANT  
Mr. Susanne Haug/USEPA  
Ms. Marlene Ivester/CH2M HILL  
Project File