

N60138.AR.002430
FISC WILLIAMSBURG
5090.3a

U S NAVY RESPONSE TO U S EPA REGION III COMMENTS TO DRAFT SITE INSPECTION
REPORT SITES 4 AND 9 AREA OF CONCERN 3 (AOC3) NWS YORKTOWN CHEATHAM
ANNEX WILLIAMSBURG VA
8/15/2011
CH2M HILL



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

August 15, 2011

Mr. John Burchette
NPL/BRAC Federal Facilities Branch
United States Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Response to Comments on the *Draft Final Site Inspection Report Site 4, Site 9, and Area of Concern 3; Naval Weapons Station Yorktown Cheatham Annex; Williamsburg, Virginia, June 2011*

Dear Mr. Burchette:

On behalf of the U.S. Department of the Navy's Naval Facilities Engineering Command (NAVFAC), CH2M HILL has prepared this letter in response to your letter dated July 25, 2011 that provided additional comments for the subject document. The initial EPA comments for this document were received in a letter dated May 13, 2011, with responses to those comments submitted June 16, 2011. The new comments received are shown in *italics*, followed by the Navy's response.

- ❖ **RE: Navy Response to EPA Comment 5:** *This response is not adequate. The concern is that by omitting the nitric acid rinse cross-contamination among samples can occur. The response needs to be more focused on this issue and not that the partnering team thought this was acceptable.*

Navy Response: The EPA's concern regarding cross-contamination among samples is noted; however analytical results from the equipment blanks that were collected during these field activities would show any cross-contamination due to poor decontamination processes, and no cross-contamination was evident.

- ❖ **RE: Navy Response to EPA Comment 7:** *BTAG does not agree with solely using the mean chemical concentrations for assessing risk to ecological receptors with limited or no mobility (e.g., invertebrates and plants). Therefore, the maximum chemical concentrations must still be considered in the "refined analysis" for soil/sediment invertebrates and plants.*

Navy Response: The response to the original comment stated that "... the magnitude of the maximum HQs, which can be used as an indicator of the presence of potential "hot-spots," was considered during the refined COPC selection process." Thus, the maximum chemical concentrations were considered during the refined analysis.

- ❖ **RE: Navy Response to EPA Comment 8:** *It still needs to be clarified if all chemicals with a maximum concentration HQs equal to or exceeding 1.0 are retained as COPCs.*

Navy Response: All detected chemicals with an HQ equaling or exceeding one based upon the maximum concentration were retained as initial COPCs. All of the initial COPCs were then evaluated further as part of the refined analysis (see previous response to Comment 7).

- ❖ **RE: Navy Response to EPA Comment 9:** *The author states "The list of chemicals to be evaluated during the RI will be included in an RI-UFP-SAP, to be submitted under a separate cover." The RI-UFP-SAP will need to clearly and adequately support the selection of the chemicals to be included in this report.*

Navy Response: Comment noted.

- ❖ **RE: Navy Response to EPA Comments 11 and 16:** *The responses need to show what "semi-quantitative risk evaluation" was used to determine that a chemical concentration that exceeded background and the screening value showed an acceptable ecological risk and that no further ecological risk evaluation was needed.*

Navy Response: Since the processes used to conduct the semi-quantitative risk evaluation were described in Appendices A (Human Health Risk Screening) and B (Ecological Risk Screening), they were not included in the June 16, 2011 RTC letter. No changes were made to the SI Report.

- ❖ **RE: Navy Response to EPA Comment 12:** *This response is not adequate. If the potential for ecological risk exists in these downgradient habitats (Youth Pond and the York River), it is not clear why these additional habitats are not included in this document. If the decision is still to not address Youth Pond and the York River in this document, then the Navy needs to clearly document how they will address the potential for ecological risk in these additional habitats.*

Navy Response: The SI was conducted to determine if a CERCLA release has occurred (including what types of constituents had been released and what media had been affected) at Site 4, Site 9, or AOC 3. As such, the CAX Partnering Team agreed that the nature and extent of the release, if identified, potential risks (human health and ecological) associated with site contaminants, and the sampling/characterization of potential migration pathways will be conducted as part of a Remedial Investigation, if warranted, for each site.

During the 7/16/2009 Partnering Meeting and a phone conversation on 7/21/2009, the EPA and Navy agreed that Youth Pond and potentially the York River, if warranted, will be investigated in the future as another site. Therefore, investigations of Youth Pond and the York River were not included in the SI. No changes were made to the SI Report.

Mr. John Burchette
Page 3
August 15, 2011

- ❖ **RE: Navy Response to EPA Comment:** *The response indicates that pesticides were not known to have been disposed of at Site 9. This suggests that all pesticide disposal activities are recorded and this information is retained in an accessible file. The uncertainty associated with this assumption needs to be adequately discussed.*

Navy Response: While it is not possible to confirm what disposal practices have historically been used at the base, the 1984 IAS identified Site 9 as a former transformer storage area. The disposal of pesticides within the vicinity of Site 9 was not identified. Currently, pesticides are used throughout the base and logs including type, use, and application/frequency rate are maintained by the base.

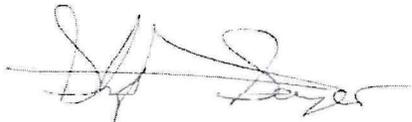
- ❖ **RE: Navy Response to EPA Comment 15:** *This response indicates it is premature to connect PCB contamination in Youth Pond to Site 9. Because Youth Pond is downstream of Site 9 it is not clear why it is not appropriate to make this connection. Again, the Navy must address how Youth Pond and the York River are going to be addressed.*

Navy Response: It has not been determined if the drainage from Site 9 is the only input into Youth Pond; therefore, it would be premature to automatically connect PCB contamination to Site 9. When Youth Pond itself is investigated, inputs into it will be evaluated. See also the response RE: EPA Comment 12 above.

If you have any questions or comments regarding the above response to comments, please feel free to contact Marlene Ivester at (757) 873-1442, X41633 or me at 757-671-6273.

Sincerely,

CH2M HILL



Stephanie Sawyer
Project Manager

cc: Ms. Krista Parra /NAVFAC Mid-Atlantic
Mr. Wade Smith/VDEQ
Ms. Marlene Ivester/CH2M HILL
Project File