N60138.AR.003014
FISC WILLIAMSBURG
5090.3a

LETTER AND U S EPA REGION II RESPONSE TO COMMENTS TO DRAFT SITE INSPECTION REPORT SITE 7 OLD DUPOINT DISPOSAL AREA FISC WILLIAMSBURG VA
5/4/2012
CH2M HILL

Monica Marrow

From: Stephanie.Sawyer@CH2M.com
Sent: Friday, May 04, 2012 12:58 PM
To: Burchette.John@epamail.epa.gov
Cc: Marlene.Ivester@CH2M.com; scott.park@navy.mil; Wade.Smith@deq.virginia.gov
Subject: Response to EPA Fourth Round of Comments on the Draft Site 7 SI Report; Sent 5/4/12
Attachments: May 5, 2012 RTCs.pdf

John,

Attached are the responses to the EPA's May 2nd comments. I don't think we're going to need a conference call as Marlene previously indicated unless you have further comments on the attached responses.

I'll be sending over the revised SI Report files (revised based on our responses in these RTCs [SI Report Text, Appendix B Text, and Appendix B Tables]) over for your approval in a separate e-mail.

If you have any questions, please let me and Marlene know.

Thanks,
Stephanie

From: John Burchette [mailto:Burchette.John@epamail.epa.gov]
Sent: Wednesday, May 02, 2012 11:43 AM
To: Sawyer, Stephanie/VBO
Cc: Ivester, Marlene/VBO; scott.park@navy.mil; Wade.Smith@deq.virginia.gov; Susanne Haug
Subject: RE: Response to EPA Second Round of Comments on the Draft Site 7 SI Report; Sent 2/29/12

Guys,
Let's schedule a conference call if you have issues with the additional BTAG Comment

John Burchette(3HS11)
Remedial Project Manager
NPL/BRAC/Federal Facilities Branch
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215.814.3378
Fax: 215.814.5518
Burchette.john@epa.gov

From: <Stephanie.Sawyer@CH2M.com>
To: John Burchette/R3/USEPA/US
Cc: <Marlene.Ivester@CH2M.com>, <scott.park@navy.mil>, <Wade.Smith@deq.virginia.gov>
Date: 04/27/2012 01:15 PM
Subject: RE: Response to EPA Second Round of Comments on the Draft Site 7 SI Report; Sent 2/29/12

John,

Attached are responses to the EPA's third round of comments on the draft CAX Site 7 SI Report, received yesterday, April 26. Since we would really like to wrap up this SI Report and start thinking about the next phase of the investigation (i.e., the RI), if there are any further comments on this Report, I suggest we get together for a conference call because it's starting to seem like we're going in circles with these responses/comments.

In order to facilitate the completion of this SI Report, early next week, I'll be sending out another e-mail that will contain all the files in which edits were made as a result of our responses included in the January 11, 2012 and February 29, 2012 RTCs. If you have any questions or comments, please let me know.

Thanks,
Stephanie

From: John Burchette [mailto:Burchette.John@epamail.epa.gov]
Sent: Thursday, April 26, 2012 9:38 AM
To: Sawyer, Stephanie/VBO
Cc: krista.parra@navy.mil; Ivester, Marlene/VBO; scott.park@navy.mil; Wade.Smith@deq.virginia.gov
Subject: Re: Response to EPA Second Round of Comments on the Draft Site 7 SI Report; Sent 2/29/12

Sorry for the delay on these. Just got them back from BTAG yesterday.

John Burchette(3HS11)
Remedial Project Manager
NPL/BRAC/Federal Facilities Branch
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215.814.3378
Fax: 215.814.5518
Burchette.john@epa.gov

From: <Stephanie.Sawyer@CH2M.com>
To: John Burchette/R3/USEPA/US, <Wade.Smith@deq.virginia.gov>, <krista.parra@navy.mil>
Cc: <Marlene.Ivester@CH2M.com>, <scott.park@navy.mil>
Date: 02/29/2012 02:42 PM
Subject: Response to EPA Second Round of Comments on the Draft Site 7 SI Report; Sent 2/29/12

To All:

Attached are the Navy's responses to the EPA's second round comments on the Draft Site 7 SI Report. The EPA comments were received via email on February 1, 2012 (see below). Once we have resolved these comments, we will submit the draft final Site 7 SI Report (red-lined for easy review) for review.

If anyone has any questions regarding these RTCs, please let me know.

Thanks,
Stephanie

From: John Burchette [mailto:Burchette.John@epamail.epa.gov]

Sent: Wednesday, February 01, 2012 3:49 PM
To: Sawyer, Stephanie/VBO
Cc: krista.parra@navy.mil; Ivester, Marlene/VBO; Wade.Smith@deq.virginia.gov
Subject: Re: Response to EPA Comments on the Draft Site 7 SI Report; Sent 1/11/12

John Burchette(3HS11)
Remedial Project Manager
NPL/BRAC/Federal Facilities Branch
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215.814.3378
Fax: 215.814.5518
Burchette.john@epa.gov

From: <Stephanie.Sawyer@CH2M.com>
To: John Burchette/R3/USEPA/US, <Wade.Smith@deq.virginia.gov>, <krista.parra@navy.mil>
Cc: <Marlene.Ivester@CH2M.com>, <Stephanie.Sawyer@CH2M.com>
Date: 01/11/2012 02:18 PM
Subject: Response to EPA Comments on the Draft Site 7 SI Report; Sent 1/11/12

To All:

Attached are the Navy's responses to the EPA's comments on the Draft Site 7 SI Report. The USEPA comments were received via email on November 2, 2011. As indicated by VDEQ in their letter dated November 10, 2011, VDEQ had no comments regarding the Draft SI Report. Once we have resolved these comments, we will submit the draft final Site 7 SI Report (red-lined for easy review) for review.

We will be discussing these RTCs on January 19, 2011, during our Partnering Meeting, however if you have any questions prior to the meeting please let Krista and I know.

Thanks,
Stephanie

Stephanie Sawyer
Associate Scientist
CH2M HILL
5700 Cleveland Street, Suite 101
Virginia Beach, VA 23462
Phone: 757-671-6273
Fax: 757-497-6885
stephanie.sawyer@ch2m.com

********** ATTACHMENT NOT DELIVERED **********

This Email message contained an attachment named
image001.jpg
which may be a computer program. This attached computer program could contain a computer virus which could cause harm to EPA's computers, network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced into the EPA network. EPA is deleting all computer program attachments sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you should contact the sender and request that they rename the file name extension and resend the Email with the renamed attachment. After receiving the revised Email, containing the renamed attachment, you can rename the file extension to its correct name.

For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

********** ATTACHMENT NOT DELIVERED **********

[attachment "Response to EPA Comments on draft CAX Site 7 SI 1_11_12.pdf" deleted by John Burchette/R3/USEPA/US] [attachment "CAX Site 7 RTCs Round 2.pdf" deleted by John Burchette/R3/USEPA/US] [attachment "April 27, 2012 RTCs.docx" deleted by John Burchette/R3/USEPA/US]

Response to Comments

Draft Site Inspection Report
Site 7

Naval Weapons Station Yorktown Cheatham Annex
Williamsburg, VA
May 5, 2012

EPA Comment (dated 5/2/12): The response to comment 3 is not acceptable. Noting the comment provides no assurance that the compound will be sufficiently addressed to the extent allowable by the existing literature and data.

Response: Looking at our original response more closely, we have noticed an error in the ecological risk screening text. Bullet 4 of Section B.3.3 states that nitroglycerin was identified as an initial COPC because it was detected and a screening value was not available. This is wrong, as there is an ecological screening value for nitroglycerin (138 µg/L, as shown in Table B-2). When the ecological screening statistics (Table B-18) were ran, the nitroglycerin screening value did not get pulled and "NSV" (No Screening Value) was assigned. Therefore, the text incorrectly states there is no screening value for nitroglycerin. The maximum detected concentration of nitroglycerin (0.23 µg/L) is several orders of magnitude below the ESV. Thus, it is reasonable to screen out nitroglycerin on this basis. We will revise the text (in Appendix B and the main body of the SI) to remove any discussion about nitroglycerin not having a screening value, and revise Tables B-18 and B-19 accordingly.

EPA Comment (dated 5/2/12): The response to comment 4 is acceptable with the provision that the pertinent information from the construction completion report is provided for review and that data supports the assumption that the backfill material does not contain any contaminants at concentrations which pose an unacceptable ecological risk.

Response: Since the CCR was submitted to the CAX Partnering team, the Navy, USEPA, VDEQ, and CH2M HILL should all have copies of the document to review. The document was also been uploaded to the Administrative Record and to NIRIS (Document Number 02419); however, since Appendix C of the CCR includes analytical data for all samples collected during the removal action, we've pulled the 300 pages of results that are pertinent to the backfill and attached for your information.

Analytical data for all samples collected during the removal action can be found in the

Final Construction Closeout Report

Shaw Environmental, Inc.

Cheatham Annex Site Post Decision File

(NIRIS Document Number **002419)**

If you have questions, please contact

Mr. Mark Piggott, Public Affairs Officer

Naval Weapons Station Yorktown, Cheatham Annex

160 Main Road

Yorktown, VA 23691-0160

mark.piggott@navy.mil

(757) 887-4939