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FISC WILLIAMSBURG
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U S NAVY RESPONSES TO U S EPA REGION III COMMENTS ON SITE MANAGEMENT
PLAN FOR FISCAL YEARS 2013 THROUGH 2014 CHEATHAM ANNEX FISC
WILLIAMSBURG VA
3/27/2013
NAVFAC MID ATLANTIC

Response to EPA Comments

Site Management Plan Update

Fiscal Years 2013-2014

Naval Weapons Station Yorktown Cheatham Annex
Williamsburg, VA
March 27, 2013

Comment 1: P. 3-5: *The report states, “The PCE source will be investigated in a future study.” Please indicate which future study will address this.*

Response: At the time this sentence originally was written, it was not known how/when the upgradient PCE detection would be addressed. However, with the Team’s recent decision to start the investigation under Site 4, the sentence has been revised as follows:

The source of PCE is not known and is not believed to be Site 4-related; however, the PCE source will be investigated initially as an addendum to the Site 4 remedial investigation UFP-SAP.

Comment 2: P. 3-10: *The report states, “However, of these constituents, chloroform is likely naturally occurring, RDX was detected in the off-site, background monitoring wells and is not considered to be a site-related contaminant, and arsenic is likely attributable to natural background conditions.” Most chloroform in the environment is man-made. Please delete this statement or explain why this is likely naturally occurring. RDX is not naturally occurring. Please delete this statement. Finding RDX in a background well indicates that the well is contaminated and should not be used for background.*

Response: Although recent research has shown that chloroform can naturally occur in soil and groundwater as a result of various sources, including soil fungi, the statement about chloroform likely being naturally occurring has been deleted. The SMP text does not say that RDX is naturally occurring. Instead, it says RDX was detected off-site, in a well that was proposed and sampled with the intention to represent site-specific background (because, at the time, we did not have agreement on the new set of background 95% UTLs). The sentence was revised as follows:

However, of these constituents, RDX was detected off-site and is not considered to be a site-related contaminant, and arsenic is likely attributable to natural background conditions.

Comment 3: P. 3-14: *The report indicates that runoff from AOC 1 enters tributaries to Jones Mill Pond. Will Jones Mill Pond be investigated as part of AOC 1?*

Response: Not at this time. The next step for AOC 1 is an ESI for groundwater and potential soil “hotspots.” It also will include sediment and surface water sampling at AOC 1 South since these two media were not evaluated during the SI. If a potential unacceptable risk is determined to exist, the ESI report will recommend the next steps for the site. Depending on the nature of the ESI results, a recommendation may or may not include sample collection within Jones Pond¹. The Team will discuss and decide at that time.

It should be noted that the AOC 1 North ravine is normally dry and only receives water from overland flow during storm events, and when it does have water, it flows towards and converges with the

¹ “Jones Mill Pond” and “Jones Pond” have been used interchangeably for several years in ERP documents. However, to be consistent with current maps for the area (both ADC road maps and base maps), “Jones Pond” will be the standard and all references to “Jones Mill Pond” in the SMP will be updated.

drainage from AOC 1 South. Therefore, calling it a “tributary” of Jones Pond is a misnomer. The AOC 1 South drainage generally has some water year round, but the amount of water (and flow velocity) is also dependent on storm events. It flows into an unnamed tributary of Jones Pond; however, there isn’t a continual, year-round flow of surface water toward Jones Pond. Based on site observations of generally dry conditions in the unnamed tributary between storm events, it is anticipated that only substantial storm events would produce sufficient surface flow to reach Jones Pond from the site. Thus, calling the AOC 1 South drainage a “tributary” may also be too strong, as it invokes the image of a perennial stream entering the pond, which is not the case. Therefore, the text language has been revised as follows:

AOC 1 is a former debris disposal area located just west of Chapman Road within two ravines, known as “AOC 1 North” and “AOC 1 South” (**Figure 3-5**). The AOC 1 North ravine is normally dry and only receives water from overland flow during storm events, and when it does have water, it flows towards and converges with the drainage from AOC 1 South. The AOC 1 South drainage generally has some water year round, but the amount of water (and flow velocity) is also dependent on storm events. It flows into an unnamed tributary of Jones Pond; however, there isn’t a continual, year-round flow of surface water toward Jones Pond. Based on site observations of generally dry conditions in the unnamed tributary between storm events, it is anticipated that only substantial storm events would produce sufficient surface flow to reach Jones Pond from the site.

Comment 4: *The 2001 Pond Study indicates several ecological, bioaccumulative and human health COPCs in the 4 ponds studied (Jones, Cheatham, Youth and Penniman). Youth Pond and Penniman Lake are addressed in the SMP. The SMP should indicate when Jones and Cheatham Ponds will be addressed.*

Response: The 2001 Pond Study did not recommend further investigation of Jones and Cheatham Ponds, just Youth Pond and Penniman Lake. In addition, the Pond Study samples from Cheatham Pond were recently evaluated and the Team agreed that Cheatham Pond was a suitable reference pond for use in the current evaluations of Site 4, Youth Pond, and Penniman Lake. Should the AOC 1 ESI (please see the response to Comment 3) conclude that there is a potential unacceptable risk related to the AOC 1 South drainage way surface water and sediment (which connects to an unnamed tributary to Jones Pond), and there is a significant potential transport pathway to Jones Pond, then the ESI may recommend that samples be collected from Jones Pond as part of the AOC 1 investigation. There is currently no intention for Jones Pond to be listed in the SMP individually as a site. Likewise, regarding the three samples collected from the southern portion of Cheatham Pond in October 2012 (originally intended to be reference samples for Youth Pond, but based on the sediment analytical results, the Team agreed to not use them), the Team needs to discuss and decide if these data warrant further investigation. Should the Team decide that further investigation is warranted, it would be conducted in the context of identifying an upgradient potential source area for contamination, not with regard to Cheatham Pond as itself a site. Therefore, there is no reason at this time for Cheatham Pond to be discussed independently in the SMP as if it were a site. The current SMP text should remain unchanged, as revisions can be made in a future, annual update to the SMP, if necessary.