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U S NAVY RESPONSE TO U S EPA REGION III COMMENTS DATED 17 JULY 2015
REGARDING THE SITE 4 PRE-FEASIBILITY STUDY TECHNICAL MEMORANDUM FISC
WILLIAMSBURG VA
09/08/2015
CH2M HILL

Response to Comments
Site 4 Pre-Feasibility Study Technical Memorandum
Naval Weapons Station Yorktown Cheatham Annex
Williamsburg, VA
September 8, 2015

Comments received by email on July 17, 2015 from Gerald Hoover, Environmental Protection Agency, Region 3.

BTAG Comments

EPA Comment #1: On page 2, the TM states that polychlorinated biphenyls (PCBs) may have been transported to and deposited within the drainage channel from an unknown source. A similar statement is made on page 10. It was BTAG's understanding that runoff from Site 9 (Transformer Storage Area) flowed into Upstream Pond and was the likely source of PCBs found at Site 4. Therefore, there is a potential source within the vicinity that could have impacted the site and this information needs to be added to this section and any other section within the report that states that the source of the PCBs is unknown.

Navy Response: Based on more recent information, the Site 9 boundary has been revised. Due to this revision, drainage boundary maps indicate that surface runoff from Site 9 does not discharge at Site 4. However, since PCBs were detected in Site 4 soil, Upstream Pond sediment and Upstream and Youth Ponds fish tissue, the Tech Memo has been revised to state that these media will be evaluated in the upcoming Feasibility Study.

Toxicologist Comments

EPA Comment #2: Proposed actions on page 11 appear appropriate and supported by the evidence and analysis in the document.

Navy Response: Comment noted.

EPA Comment #3: Generally helpful if a table of the soil samples incorporated into the analyses of the risk for soils outside the fence (attachment 1) and for soils outside the fence and debris areas (attachment 2). This would improve the transparency of the document. In addition, specify if samples were considered 'inside' or 'outside' the fenced area; this was difficult to follow throughout the pre-FS.

Navy Response: A table has been added to Attachment 1 and Attachment 2 to identify the soil samples incorporated into the risk analysis. In addition, Figure 4 has been revised to identify soil sample locations as either "inside" or "outside" of the fenced area.

EPA Comment #4: Page 2 – The remedial investigation is described as '2012' and referenced as '2014.' Please clarify throughout document.

Navy Response: The remedial investigation field work was completed in 2012 and the remedial investigation report documenting the field work was finalized in 2014. No changes to the document were made.

EPA Comment #5: Page 3, Previous Investigations, last 4 bullets – The last 4 bullets in this section highlight the recommendations from the RI and do not include soil at Site 4; however, the RI concluded that the FS should address buried debris and potentially unacceptable risks associated with potentially site-related COCs in soil and groundwater. Please clarify.

Navy Response: The first bullet has been revised to include soil at Site 4.

EPA Comment #6: Page 9 – First paragraph under "Non-CERCLA-Regulated Sources" – Delete 'large' in "A large component of stormwater..." The contribution of the various stormwater routes was not quantified and describing as "large" is a mischaracterization of the evidence.

Navy Response: The requested revision has been made.

EPA Comment #7: Attachment 1, Table 5.1 – oral-to-dermal adjustment factor for vanadium is 2.6%, not 100%, according to RSL summary table.

Navy Response: The requested revision has been made.