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LETTER REGARDING U S EPA REGION III COMMENTS ON THE DRAFT TECHNICAL
MEMORANDUM U S EPA REGION III ADDITIONAL CONCERNS REGARDING THE FORMER
PENNIMAN SHELL LOADING PLANT AT CHEATHAM ANNEX FISC WILLIAMSBURG VA
11/23/2011
U S EPA REGION III



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

November 23, 2011

Ms. Krista Parra
NAVFAC MIDLANT, Building N-26
Hampton Roads Restoration Product Line, Code OPHREV4
9742 Maryland Avenue
Norfolk, VA 23511-3095

Subject: Draft Technical Memorandum. United States Environmental Protection Agency Region 3's Additional Concerns Regarding the Former Penniman Shell Loading Plant.

Ms. Parra:

Thank you for the opportunity to review the subject document. EPA would like to provide the following comments at this time.

EPA RPM Comment 1: Page 3: "In Ground Battery". EPA doesn't concur with the no further action determination for the in ground battery. Please try to reschedule the site visit with current team members. EPA generally prefers to make no further action determinations based on scientifically defensible data (sample data etc...).

EPA RPM Comment 2: Page 4: Please include the groundwater data as part of the AOC 6 Ammonia Settling Pit ESI.

EPA RPM Comment 3: Page 4: "Large Drum with Side Port". Three screening criteria used. 95% UCL or UTL of background should be used and not maximum (for screening purposes). Please rescreening accordingly. Please explain what "site specific RBC's" are.

EPA RPM Comment 4: Page 5: "Detonation Craters/Blast Holes". Page 5. See RPM Comment 3.

EPA RPM Comment 5: Page 5. Perchlorate should not have a background value. Please remove this discussion. Below the tap-water RSL is sufficient.

EPA RPM Comment 6: Page 6. Booster Test Pit. The geophysical survey was conducted to determine whether piping underground could be present. Potential linear anomalies were detected during the investigation. This should be investigated further. Additionally, have we ever/can we, go in to the structure? The top of it appeared to be removable, possibly it could just be pulled off and we could look down in it? My concern is that explosives were stored/are stored in the building primarily due to its' structure. Outside of the building is a double wall and the top looks like it was made to blow off. Structures like this were typically used to store explosives.

EPA RPM Comment 7: Figure 6. Why is the soil sample location so far from the Privy tank location?

EPA RPM comment 8: Attachment 2. First Page. Final Paragraph. Was the checking for piping ever completed?

EPA RPM Comment 9: Attachment 4. Page A4-4. Human Health Risk Screening Conclusion. "extremely unlikely that is ever would be used as a potable water supply". "is: is a typo and it should EPA's groundwater policy still applies as this would be considered a potentially potable source.

If you have any questions, please contact me at 215-814-3378.

Sincerely,

A handwritten signature in black ink, appearing to read "John Burchette", written over a light gray rectangular background.

John Burchette
Remedial Project Manager

cc: Wade Smith, VDEQ