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LETTER AND BAKER RESPONSES ON BEHALF OF THE NAVY TO U S EPA REGION 3
COMMENTS REGARDING DRAFT FINAL WORK PLAN FOR SITE SCREENING PROCESS
AT SITE SCREENING AREAS 2, 17, 18 AND 19 NWS YORKTOWN VA
2/22/1995
BAKER ENVIRONMENTAL INC

Baker

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Baker Environmental, Inc.
Airport Office Park, Building 3
420 Rouser Road
Coraopolis, Pennsylvania 15108

February 22, 1995

(412) 269-6000
FAX (412) 269-2002

U.S. Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, Pennsylvania 19107

Attn: Mr. Robert Thomson, P.E.
Remedial Project Manager (3HW71)

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0267
Response to USEPA Comments
Draft Final Work Plan
SSP at SSAs 2, 17, 18 and 19
Naval Weapons Station Yorktown, Yorktown, Virginia

Dear Mr. Thomson:

Baker Environmental and the Navy are pleased to provide a copy of the responses to comments on the Draft Final Work Plan for SSAs 2, 17, 18 and 19, Naval Weapons Station Yorktown, Yorktown, Virginia for your review and consideration. These responses have been incorporated into the Final Work Plan.

Response to Comments are presented in Attachment A. For your convenience the USEPA comment letter (dated January 4, 1995) is included in Attachment B.

If you have any questions concerning this correspondence please contact me at (412) 269-2038 or Mr. Richard F. Hoff (Activity Coordinator) at (412) 269-2099.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Donald C. Shields
Project Manager

RFH/lq

Attachments

cc: Mr. Steve Mihalko, VDEQ
Mr. Jeffery Harlow, WPNSTA
Mr. Gregory Hatchett, Navy Technical Representative



A Total Quality Corporation

Attachment A
Response to USEPA Region III Comments

ATTACHMENT A
Response to USEPA Region III Comments
Draft Final Work Plan
Site Screening Process at Site Screening Areas 2, 17, 18 and 19

Comment Letter dated January 4, 1995

1. The removal action at SSA 2 consisted of removal of surface debris. No clean fill was introduced in this area. Surface soils collected at SSA 2 will be representative of natural conditions on-site.
2. Please refer to the response to comment 1.
3. Six borings will be advanced at SSA 19. The text has been revised to reflect this.
4. Approximate locations of the detonation holes have been added to Figure 4-4.

Attachment B
USEPA Comment Letter



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Office of Superfund
Robert Thomson, P.E.
Mail Code 3HW71

Direct Dial (215) 597-1110
FAX (215) 597-9890

Date: January 4, 1995

Ms. Brenda Norton, PE
Atlantic Division, Naval Facilities Engineering Command
Environmental Quality Division
Code: 1822
Building N 26, Room 54
1510 Gilbert Street
Norfolk, Va 23511-2699

Re: Naval Weapons Station, Yorktown, Va. -
Site-Screening Areas 2, 17, 18, and 19
Review of draft final *Work Plan*

Dear Ms. Norton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Navy's draft final *Work Plan* for the investigation of Site-Screening Areas 2, 17, 18, and 19 located at the Naval Weapons Station-Yorktown (WPNSTA) NPL facility. Based upon that review, EPA has the following comments to offer on the draft final document:

SPECIFIC COMMENTS

1. Page 2-2, Section 2.1.2

The final *Work Plan* should include a brief discussion of the removal activities which occurred prior to the performance of this SSA investigation. This is very important to the selection of the SSA sampling scheme, as the ground may have clean fill where SSA surface soil samples are currently planned.

2. Page 4-2, Section 4.1.1.

The sampling plan for SSA 2 should be coordinated with prior removal activities, especially in areas where confirmation soil samples are located in areas of recent regrading and backfilling. If the confirmation sampling locations are located in areas of regrading or backfilling, the confirmation samples should be taken at a depth of 0 to 6 inches below the regraded area or backfill to insure that the original site is being sampled, not backfill soil.

3. Page 4-9, Section 4.4.2

Although the first statement in 4.4.2 states that 6 soil borings will be advanced, only 5 soil boring locations are described. However, 6 soil boring locations are depicted in Figure 4-4.

4. Figure 4-4

Please show the location of detonation holes 1 and 2 on Figure 4-4.

This concludes EPA's comments on the review of the Navy's draft final *Work Plan* for the investigation of Site-Screening Areas 2, 17, 18, and 19 located at the WPNSTA. In developing the final *Work Plan* for SSAs 2, 17, 18, and 19, please forward three copies of the final *Work Plan* to EPA for incorporation into the official project files for the Naval Weapons Station. If you have any questions, please feel free to call me at (215) 597-1110.

Sincerely,



Robert Thomson, PE
VA/WV Superfund Federal Facilities (3HW71)

cc: Jeff Harlow (WPNSTA, Code 09E32)
Stephen Mihalko (VDEQ, Richmond)
Andy Rola (BVWST, Phila.)
Bruce Rundell (USEPA, 3HW13)
Nancy Rios (USEPA, 3HW13)
Bob Davis (USEPA, 3HW13)