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LETTER AND U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL
QUALITY COMMENTS REGARDING DRAFT FEASIBILITY STUDY REPORT FOR
GROUNDWATER AT SITE 22 NWS YORKTOWN VA

09/13/2010
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September 13, 2010

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Mr. Wade Smith
Remedial Project Manager
Virginia Department of Environmental Quality
629 East Main Street, 4th Floor
Richmond, VA 23219

Subject: Response to Comments *Draft Feasibility Study Report for Groundwater, Site 22,*
WPNSTA Yorktown
Yorktown, Virginia

Dear Mr. Smith

This letter is in response to your comments on the subject document provided in your comment letter dated 25 August 2010. All requested editorial comments will be incorporated as requested.

Comment 1: Section 3.2 (Page 3-2) states that one of the RAOs for groundwater is to maintain LUCs until contaminant concentrations in groundwater allow for unlimited use and unrestricted exposure. However, Section 1.4 states that Site 22 is located inside an area encumbered by the ESQD and cannot be developed for real estate purposes. Please include a discussion of if/how the ESQD affects the RAOs.

Response 1: The following text will be added to Section 3.2: "The ESQD arc does not impact the overall RAOs for the site. The ESQD arc will be in effect as long as ordnance and munitions activities are being conducted at WPNSTA Yorktown. However, the RAO to maintain LUCs is necessary in the event that ordnance activities and development restrictions posed by the ESQD arc are discontinued at the base."

Comment 2: Please include a discussion in Section 3.3 (Page 3-4) on why the inferred 100 ug/L TCE groundwater isoconcentration contours on Figure 3-1 (and subsequently on Figures 4-2 and 4-3) are not adjoining.

Response 2: The isoconcentration contours are not shown as adjoining on the basis of the MIP data which identified a clean area between the two areas of higher concentration (see attached Figure 6-3 from the RI Report. A footnote will be added to Figure 3-1 and subsequent figures to provide clarification.

Comment 3: In Virginia, both MCLs and SMCLs are contained in the Department of Health's *Waterworks Regulations*: 12 VAC 5-590-10 to 1280. The statutory basis for the

Waterworks Regulations is found in Chapter 6 of Title 32.1 of the Virginia Code, *Environmental Health Services*: Va. Code Ann. §§ 32.1-163 to 248.2. In the absence of MCLs/SMCLs, other health-based standards or criteria, or best professional judgment based on risk assessment, may be employed. Where groundwater that is a potential drinking water source discharges to surface water, the cleanup level at the discharge point would be the more stringent of either the MCL/SMCL or a discharge limit based on the *Water Quality Standards*: 9 VAC 25-260-5 to 550. Please add *Waterworks Regulations*: 12 VAC 5-590-10 and 440.

Response 3: 12VAC 5-590-440 specifies analytical methods to be employed by a waterworks operation and therefore they are not applicable or relevant and appropriate to activities that would be conducted at Site 22 based on the alternatives presented in the FS. Additionally, the criteria specified are not more stringent than Federal MCLs which have been included as applicable chemical-specific ARARs for the constituents of concern at Site 22. As per 40 CFR 300.400 (g)(4), only state regulations that are more stringent than federal requirements may be considered applicable or relevant and appropriate.

Comment 4: Please add the Erosion and Sediment Control Regulations: 4 VAC 50-30-10 to 110, to the Virginia Action-specific ARARs for those alternatives that may require monitoring well installation or land disturbing activities.

Response 4: The Erosion and Sediment Control Regulations, VA Code Ann. §§ 10.1-562 - 573 will be added to the ARARs table as requested. However, because site activities will disturb less than 10,000 sq ft, the work to be completed at the site may be eligible for a waiver. Surface disturbance activities will result in negligible impact to surface runoff characteristics. None of the remedial activities proposed in the FS at Site 22 will result in land development. Consequently, it is believed that the substantive requirements of the Erosion and Sediment Control Regulations only need to be attained.

Please feel free to contact me should you have any additional questions.

Sincerely,

CH2M HILL



William Friedmann
Project Manager

cc: Mr. Tom Kowalski/NAVFAC
Mr. Robert Thomson/USEPA
Ms. Laura Cook/CH2M HILL