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LETTER AND U S NAVY RESPONSE TO U S EPA REGION III COMMENTS REGARDING DRAFT PROPOSED PLAN FOR SITE 32 WETLANDS AREA DOWNGRADIENT OF BEAVER POND NWS YORKTOWN VA
02/02/2011
CH2M HILL

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CH2MHILL

February 2, 2011

391638.RP.DF.25

Mr. Robert Thompson
Office of Federal Facility Remediation
United States Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Response to Comments on *Draft Proposed Plan Site 32: Wetlands Area Downgradient of Beaver Pond, Naval Weapons Station Yorktown, Yorktown, Virginia*, October 2010

Dear Mr. Thompson:

On behalf of the U.S. Department of the Navy's Naval Facilities Engineering Command (NAVFAC), CH2M HILL has prepared this letter is in response to your January 14, 2011 e-mail, providing comments for the subject document via markups in the PDF file. Comments received are shown in italics, followed by the Navy's response in Blue.

- *Comment #1 – [Throughout the document] Either use Site 32 or "Site", but be consistent. I would use Site 32*

  Response: Changes were made to refer to the site as Site 32 throughout the document.

- *Comment #2 - [Section 2, Previous Investigations and Actions] By who, under what order?*

  Response: The removal of STP 2 and the 12 drums of mercury-contaminated soil was ordered by the base and was not a part of any CERCLA action for Site 32. A construction completion report detailing the work performed and who performed the work could not be located by base personnel. No changes to the document were made.

- *Comment #3 - [Section 2, Limited Field Investigation] By who?*

  Response: The August 2003 limited field investigation was conducted by Baker Environmental, Incorporated. The text has been updated to include this information.

- *Comment #4 - [Section 2, Limited Field Investigation] Explain in more detail this investigation and what it was called so it can be found in the AR.*

  Response: The results of the limited field investigation were included in the Final Project Plans Step 3B and 4 of the **Baseline** Ecological Risk Assessment (BERA) report. The text has been revised to include this information.

- *Comment #5 - [Section 2, Final Steps 6 and 7 of the Aquatic Baseline Ecological Risk Assessment] What is this?*

  Response: The WPNSTA Yorktown Partnering Team agreement of the Aquatic BERA work plan is discussed in the 8-17-05-42 Consensus Statement. The text has been revised to include a reference to this consensus statement.

- *Comment #6 - [Section 2, Final Engineering Evaluation/Cost Analysis Site Screening Area 25] Because it was removed under the EECA?*

  Response: The sediment and surface water was not removed under the EE/CA. The streamlined human health risk screening was completed and the results were presented in the EE/CA. The text was revised to clarify this information.

- *Comment #7 - [Section 3, Site Characteristics] Reword*

  Response: The first sentence in the third paragraph has been revised.

In addition, all editorial changes have been accepted and retained and are not discussed on a case by case basis within this letter. If you have any questions or comments regarding the above response to comments, please feel free to contact me at 757-671-6273.

Sincerely,

CH2M HILL

Stephanie Sawyer
Project Manager

cc: Mr. Tom Kowalski/NAVFAC
Mr. Wade Smith/VDEQ
Mr. Bill Friedmann/CH2M HILL
Project File