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LETTER AND U S NAVY RESPONSE TO U S EPA REGION III COMMENTS REGARDING
DRAFT RECORD OF DECISION FOR SITES 4 BURNING PAD RESIDUE LANDFILL, 21
BATTERY AND DRUM DISPOSAL AREA AND 22 BURN PAD NWS YORKTOWN VA
06/16/2011
CH2M HILL



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June 16, 2011

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

Subject: Response to USEPA Comments on *Draft Record of Decision, Site 4 – Burning Pad Residue Landfill, Site 21 – Battery and Drum Disposal Area, & Site 22 – Burn Pad; Naval Weapons Station Yorktown; Yorktown, Virginia*

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 in response to your April 28, 2011 email, providing comments for the subject document. Comments are presented, shown in italics, followed by Navy's responses.

1. Comment: *[Table 1, Page 2-4] How did this (referencing the groundwater risk discussion) change from 1992 to no unacceptable non-cancer hazard?*

Response: Sites 4, 21, & 22 were included as part of a Round One Remedial Investigation Report for Sites 1-9, 11, 12, 16-19, and 21 in 1993. The three sites were evaluated to determine whether they could be closed out with available data or would require additional data to perform a quantitative risk assessment. The screening level risk assessments for each site determined that media required additional data and the performance of quantitative human health and ecological risk assessment. A Round II RI completed in 2001 collected additional information and determined that surface water and sediment did not pose unacceptable risk; groundwater for Sites 4, 21, and 22 required further evaluation. Based on the conclusions and recommendations of the Round II RI, a groundwater RI for Sites 4, 21, and 22 was completed in 2009. Table 1 provides only a summary of the results of the Round I and Round II investigations and, based upon previous comments received from EPA on December 8, 2010, does not include a detailed risk evaluation discussion. A more detailed risk discussion is included in Section 2.6 of the ROD. No revision has been made to the table based on this comment.

2. Comment: *[Table 1, Page 2-5] Being what? Identify. (referencing the original source at Site 4 and Site 21)*

Response: Additional text has been added to identify the source materials at Site 4 (surface debris, buried batteries, and an ash pile) and Site 21 (batteries and drums).

3. Comment: *[Section 2.6.1, Site 4 Groundwater and Groundwater Seeps, Page 2-10] Are we going to follow up on this?*

Response: This comment is referencing the sentence which indicates that detected concentrations of 1,3-dinitrobenzene will likely be reduced to below established risk screening values over time by natural advective and dispersive processes. No Action is proposed for the groundwater at Site 4. Therefore, no additional follow up is proposed for 1,3-dinitrobenzene at the site. No change was made to the text based on this comment.

4. Comment: *[Section 2.6.1, Site 4 Groundwater and Groundwater Seeps, Page 2-10] Not clear what this is trying to say?*

Response: This comment is in reference to the sentence that states, "The Partnering Team agrees that concentrations of arsenic at Site 4 are not site-related." This sentence (and subsequent similar sentences) has been revised to state, "The USEPA and Navy agree that arsenic detected at Site 4 was likely the result of geochemical conditions driven by the degradation of organic matter, rather than a direct source from Site 4." This is consistent with the conclusions made in the Round Two RI.

All other editorial and formatting comments were made as suggested in the comments provided. If you have any questions or comments regarding the above response to comments, please feel free to contact me at 757-671-6223.

Sincerely,



William J. Friedmann, Jr.
CH2M HILL
Activity Manager

cc: Mr. Tom Kowalski /NAVFAC Mid-Atlantic
Mr. Moshood Oduwole/USEPA Region III
Mr. Wade Smith/VDEQ
Ms. Mary Anderson/CH2M HILL
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