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LETTER AND VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY COMMENTS TO
DRAFT FEASIBILITY STUDY REPORT FOR GROUNDWATER SITE 22 NWS YORKTOWN
VA
8/25/2010
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY



COMMONWEALTH of VIRGINIA

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August 25, 2010

Mr. Thomas Kowalski
NAVFAC MIDLANT, Building N-26
Hampton Roads Restoration Product Line, Code OPHREV4
9742 Maryland Avenue
Norfolk, VA 23511-3095

**RE: Draft Feasibility Study Report for Groundwater at Site 22
Naval Weapons Station Yorktown
Yorktown, Virginia**

Dear Mr. Kowalski:

The Virginia Department of Environmental Quality (DEQ) has received the *Draft Feasibility Study Report for Groundwater at Site 22* (Draft FS Report) for Naval Weapons Station Yorktown, Yorktown, Virginia. The June 2010 Draft FS Report, prepared by CH2M HILL, was received by the DEQ on June 24, 2010.

Thank you for providing the DEQ's Office of Remediation Programs the opportunity to review the above-referenced Draft FS Report. Subsequent to DEQ's internal review, this office has the following comments:

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 on if/how the ESQD affects the RAOs.

Please delete, "Couldn't we at least show where VC exceeded 10?" from Section 3.3 (Page 3-4).

Please include a discussion in Section 3.3 (Page 3-4) on why the inferred 100 µg/L TCE-Groundwater Isoconcentration Contours on Figure 3-1 (and subsequently Figures 4-2 and 4-3) are not adjoining.

ARARs COORDINATOR'S COMMENTS

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.

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.

This letter is intended only as guidance and is not intended to be a case decision under the Virginia Administrative Process Act. If you would like to discuss this guidance, please contact me at (804) 698-4125 or wade.smith@deq.virginia.gov.

Sincerely,



Wade M. Smith
Remediation Project Manager
Office of Remediation Programs

cc: Robert Thomson, EPA