

N00109.AR.002458
NWS YORKTOWN
5090.3a

LETTER AND U S EPA COMMENTS TO DRAFT TECHNICAL MEMORANDUM FOR
GROUNDWATER AT SITE 30 NWS YORKTOWN VA
4/14/2009
U S EPA

Sawyer, Stephanie/VBO

From: Friedmann, William/VBO
Sent: Tuesday, April 14, 2009 2:42 PM
To: Dragoo, Stephanie/VBO
Cc: Mills, Jason/VBO
Subject: FW: NWS-Yorktown EPA comments on draft Site 30 GW TM
Attachments: EPA review draft TM GW Site 30.pdf

Stephanie,

Here is the comments from the EPA on the Site 30 GW TM. VDEQ just indicated to me today that they will be providing comments to us soon. After that, we can discuss how we will address. Bill

-----Original Message-----

From: Thomson.Bob@epamail.epa.gov [<mailto:Thomson.Bob@epamail.epa.gov>]
Sent: Monday, April 06, 2009 11:05 AM
To: tom.kowalski@navy.mil
Cc: Friedmann, William/VBO; Ives, Rebekah/VBO; Skip.Dunham@shawgrp.com; wmsmith@deq.virginia.gov
Subject: NWS-Yorktown EPA comments on draft Site 30 GW TM

Attached, please find EPA's comments related to the Navy's draft TM for groundwater at Site 30, located at the NWS-Yorktown NPL site. Note that EPA is not in disagreement that the TCE detected in well A24-GW02 could be a false positive. However, the technical merits of determining such, as outlined in the draft TM, are lacking.

Robert Thomson, PE, REM
Office of Federal Facility Remediation
US EPA - Region 3
215-814-3357

(See attached file: EPA review draft TM GW Site 30.pdf)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Robert Thomson, P.E., R.E.M.
Office of Federal Facility Remediation

Direct Dial (215) 814-3357
Mail Code: 3HS11

Date: April 6, 2009

Mr. Thomas Kowalski
NAVFAC MIDLANT, Code EV3
9742 Maryland Avenue
Building N-26, Room 3208
Norfolk, VA 23511-3095

Re: Naval Weapons Station--Yorktown NPL site, Yorktown, Va.
Site 30 – Bracken Road Incinerator
Review of draft *Site 30 Groundwater Data Review and Risk Management Consideration Technical Memorandum*

Dear Mr. Kowalski:

Enclosed, please find the U.S. Environmental Protection Agency's (EPA's) comments pertaining to the review of the U.S. Navy's (Navy's) March, 2009 draft *Site 30 Groundwater Data Review and Risk Management Consideration Technical Memorandum* (TM) for Site 30, the Bracken Road Incinerator, located at the Naval Weapons Station-Yorktown (NWS-Yorktown) NPL site:

GENERAL COMMENTS

1. In the future, when installing wells at the site, please include, at a minimum, three wells so that groundwater flow direction can be accurately determined.
2. Before conducting a "risk evaluation" for groundwater at a site, please evaluate whether a release from the source area has occurred. This would include developing a table of the identified soil PRGs and comparing them to the constituents detected in groundwater above screening criteria. The draft TM does not accomplish this task.
3. If the TCE detected in 1997 in well A24-GW02 could not be replicated in 2008, then it is evident that the TCE is no longer present in groundwater at that location. However, if well A24-GW01 is considered "down gradient" of the source area (how this can be determined with 2 wells is unknown), then it is unclear why well A24-GW01 was not also sampled in 2008, since migration could have occurred.

This concludes EPA's review of the Navy's March, 2009 draft *TM* for Site 30, the Bracken Road Incinerator, located at the NWS-Yorktown NPL site. If you have any questions, please feel free to call me at (215) 814-3357,

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Thomson". The signature is fluid and cursive, with the first name "Robert" being more prominent than the last name "Thomson".

Robert Thomson, P.E., R.E.M.
Federal Facility Remediation (3HS11)

Cc: Wade Smith (VaDEQ, Richmond)
Dawn Ioven (USEPA, 3HS41)