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TRANSMITTAL LETTER REGARDING FINAL GROUNDWATER DATA REVIEW AND RISK  
MANAGEMENT CONSIDERATION SITE 30 NWS YORKTOWN VA

5/15/2009  
CH2M HILL



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May 15, 2009

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Commanding Officer  
NAVFAC Mid-Atlantic, Bldg. N-26, Room 3208  
Attention: Mr. Thomas Kowalski  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Subject: Submittal of Final Yorktown Site 30 Groundwater Data Review and Risk  
Management Consideration  
WPNSTA Yorktown, Yorktown, Virginia  
Navy Clean 1000 Program - Contract N62470-08-D-1000  
Contract Task Order 0058

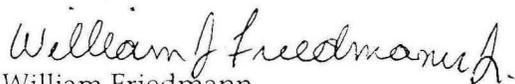
Dear Mr. Kowalski:

Enclosed please find two hard copies of the May 2009 *Final Yorktown Site 30 Groundwater Data Review and Risk Management Consideration*, WPNSTA, Yorktown, Virginia. Hard copies are also being provided to the U.S. Environmental Protection Agency (USEPA) Region 3 and Virginia Department of the Environmental Quality (VDEQ). Three additional signature pages are being provided to Mr. Rob Thomson of USEPA Region 3 in order to provide the USEPA, VDEQ, and the Navy with one copy each of the original signatures. Following signatures, a CD-ROM containing the final, signed .pdf file will be provided to the team.

This letter also provides the Navy's response to comments to USEPA and VDEQ comments received on the draft document. These comments and the proposed edits were presented to the WPNSTA Yorktown Partnering Team on April 30, 2009.

Should you have any questions, please feel free to contact me at (757) 671-6223.

Sincerely,

  
William Friedmann  
CH2M HILL

cc: Mr. Rob Thomson/USEPA - 1 hardcopy, 3 additional signature pages  
Mr. Wade Smith/VDEQ - 1 hardcopy  
Mr. Adam Forshey/CH2M HILL - cover letter  
Ms. Stephanie Sawyer/CH2M HILL - cover letter

## **Responses to VDEQ comments on the Yorktown Site 30 Groundwater Data Review and Risk Management Consideration, WPNSTA Yorktown, Yorktown, Virginia, dated March 2009**

1. Please revise sampling date in Attachment 1. (10/14/1997 not 10/13/1997)

**Response: The requested changes have been made.**

2. Please revise detection in Attachment 1. (9,210 not 9,210 J)

**Response: The requested changes have been made.**

3. Please revise sampling date in Attachment 1. (8/5/2008 not 5/8/2008)

**Response: The requested changes have been made.**

4. Please include the Chain-of-Custody to indicate the sample collection date. Without field logs, the data currently only indicates the Date Received and the Date Analyzed.

**Response: A copy of the Chain-of-Custody for the most recent groundwater sampling has been added to the attachments. Because the previous round of sampling was conducted by Baker, a Chain-of-Custody for those samples was unable to be located.**

5. Please define acronyms included in Table 1.

**Response: The requested changes have been made.**

6. What compound?

**Response: The text has been amended to read "The low estimated levels of TCE indicate that the results may have been impacted by lab contamination."**

7. This is the first mention of a 1,1-DCE detection, please explain.

**Response: The detection of 1,1-DCE was noted on page 2 of the Tech memo. 1,1-DCE was detected at a concentration of 1 J µg/L at the same well as TCE was detected. However, there was no further discussion of 1,1-DCE in the Tech Memo because the detected concentration did not exceed any risk screening values. The passage in question has been amended to read "The presence of TCE and its degradation product, 1,1-DCE, do not correspond with the known use of the site and may be the result of false positive detection based on the high number of estimated values in the 1997 data" in order to clarify why 1,1-DCE was mentioned again.**

8. This report is not included in References, please explain.

**Response: The date of the report was incorrectly reported in the text of the memo. The date has been changed to match the corresponding reference.**

9. Please update with Final report date when complete.

**Response: The report title will be updated in the references once the report is finalized.**

10. Please define acronyms included in Attachment 1 and Attachment 2.

**Response: A glossary section has been added to the end of the Tech Memo to properly define any acronyms used.**

**Responses to EPA comments on the Yorktown Site 30 Groundwater Data Review and Risk Management Consideration, WPNSTA Yorktown, Yorktown, Virginia, dated March 2009**

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.

**Response: The comment has been noted and will be taken into account when considering future well placement at sites.**

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.

**Response: As requested, a table has been included comparing the contaminants of concern across the different media. The table supports that the COCs for soil did not leach to groundwater.**

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.

**Response: Due to the fact that the presence of TCE and 1,1-DCE are not consistent with the known historical use of Site 30 and each were detected only in groundwater at one location and in at low concentrations, it was believed that the detection was a false positive detection. Therefore, second round of sampling at Site 30 was agreed upon in partnering to confirm that the first detection was an error, not to check for potential migration. The resampling data had no detected VOC compounds which supports the point that there was no release of VOCs to groundwater at Site 30.**