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U S NAVY RESPONSE TO U S EPA REGION III ADDITIONAL COMMENTS TO DRAFT SAMPLING AND ANALYSIS PLAN SITE 7 EXPANDED REMEDIAL INVESTIGATION NWS YORKTOWN VA
6/13/2012
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June 13, 2012

Mr. Moshood Oduwole
Federal Facility Remediation (3HS11)
USEPA Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Subject: Response to Additional Comments received June 4, 2012 on the Draft Sampling and Analysis Plan, Site 7 Expanded Remedial Investigation, NWS Yorktown, Yorktown, Virginia

Dear Mr. Oduwole,

This letter is in response to the additional comments received from USEPA on June 4, 2012 for the subject document. Responses also reflect the discussions during the May 30 and May 31, 2012 Naval Weapons Station Yorktown Partnering Team meeting. Comments are presented below followed by responses in italics.

Comment 1: After reviewing Response 1, it has been concluded that additional samples need to be located where contaminants / chemicals potentially entered or left buildings 375, 502, 503, 504, 505, 2007, 2008, 503A, 502A, and 505A. Also, for conveyor belt building 505A, there needs to be three samples placed similarly to those in building 502A.

> *Response: Please refer to the attached proposed sampling figure and table, which outlines the addition of 9 more soil sample locations (for a total of 40 locations) agreed to during the May 30th and 31st WPNSTA Yorktown partnering meeting. Samples have been added at potential loading/unloading points, along conveyor belt 505A, and with increased frequency within the former building footprints.*

Comment 2: According to Figure 1, sample location 24 is not under either Building 504 or 505, but between them and the description provided in the table is not adequate. A minimum of two additional samples in each of these former buildings need to be added.

> *Response: Please see response to Comment #1. Additional sample locations have been added in and around these two buildings.*

Comment 3: Regarding Response 2, it would be beneficial if additional chemical information on the concentrations of contaminants in the backfill material were provided to ensure that additional samples are not needed in this area.

Response: As agreed to during the May 30th and 31st partnering meeting, questions regarding the condition of the backfill material will be reserved for the 5 year review. No change will be made based upon this comment.

Comment 4: Bullet 6 of Comment 2 recommended that areas downgradient of all outfall structures needed to be sampled. The RTC (bullet 6) stated that the Navy agrees to collect a sediment sample from each downgradient outfall location as shown in Figure 1. Figure 1 shows all four outfall samples are right at the pipe. Many of these outfall pipes had scour holes immediately below the pipe because of the drop in elevation between the pipe and creek. These scour holes are not depositional and it would not be appropriate to sample in these areas. The sample should instead be collected at the first depositional area downgradient from the pipe. In most cases, this would be in the floodplain of the tributary of Felgates Creek and may be ten or more feet from the actual pipe.

Response: Outfall sediment sample locations will be field determined and will be located at the first depositional area downgradient of each outfall. A note has been added to the attached figure and table and this approach will be outlined in the SAP.

Please provide acceptance of these responses. Should you have any additional questions, please feel free to contact me.

Sincerely,

CH2M HILL

William J Friedmann Jr

William J. Friedmann, Jr.
Activity Manager

cc: Mr. Wade Smith/VDEQ
Mr. James Gravette/NAVFAC Midlant
Mr. Adam Forshey/CH2M HILL
Ms. Mary Anderson/CH2M HILL

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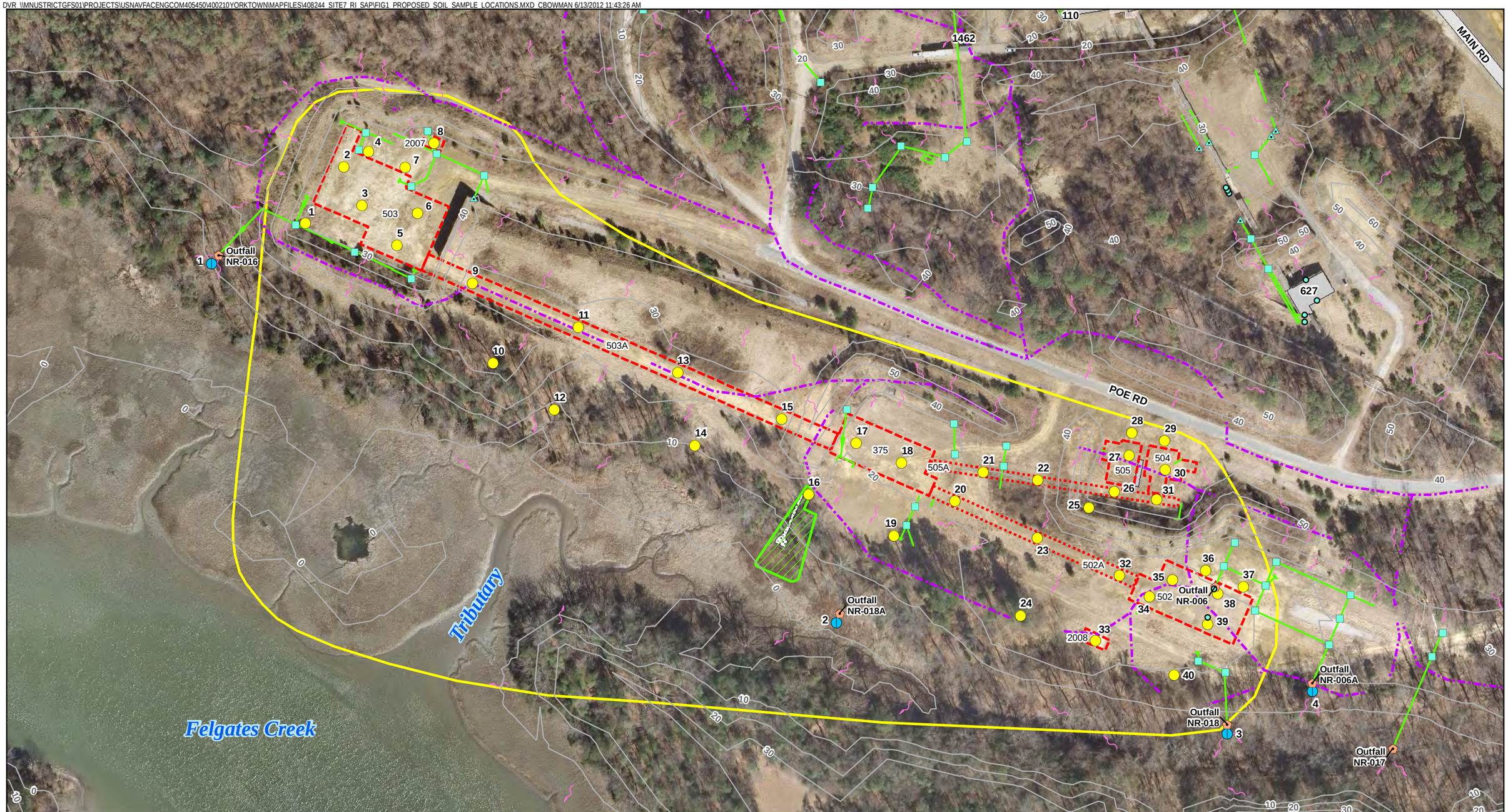

Legend

- Proposed Soil Sample Location
- Proposed Sediment Outfall Sample Location
- Building Drain
- Culvert
- Drop Inlet
- Outfall
- Drainage Boundary
- Storm Sewer
- Elevation Contour (10 ft interval)
- Overland Flow
- Study Area
- Former Buildings
- Rip Rap Area
- Site 7 Removal Area (1996)

N W E S

0 150 300 Feet

Note:
-A minimum of 8 surface water and 8 additional sediment samples will be collected to evaluate Felgates Creek or its tributaries. The locations of the creek/tributary samples will be selected by the Team based upon soil and groundwater data.
-Drop inlet locations identified in the figure are from the base Storm Water Pollution Prevention Plan. During a recent site inspection, no drop inlet boxes were observed. The drop inlets may have been removed or covered as part of the building demolition.
-Proposed Outfall sample locations will be positioned in the first depositional area downgradient of the Outfall.

Figure 1
Site 7 Proposed Soil Sample Locations
Naval Weapons Station Yorktown
Yorktown, Virginia

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Sample Number	Rationale for Sample Location
1	Evaluate surface runoff and soil deposition that may have occurred during plant operation or as a result of building demoliton from the upgrading former Building 503.
2, 3, 5, 6	Evaluate soil characteristics beneath former Building 503. No floor drains were located within this building and there was no known release associated with this area; therefore, 4 discrete sample locations are recommended to confirm no release has occurred.
4,7	Evaluate soil characteristics from the most likely loading/unloading zone associated with Buidling 503.It is unknown if a relase has occurred; therefore, 2 discrete sample locations are recommended from the area north of Buidling 503.
8	Evaluate soil characteristics beneath former Building 2007. No floor drains were located within this building and there was no known release associated with this area; therefore, 1 discrete sample location is recommended to confirm no release has occurred.
9, 11, 13, and 15	discrete sample locations are recommended within the former conveyor belt area. The two edge samples (Sample 7 and Sample 9) will be biased toward the respective buildings because it is believed to be most likely to to have received contamination based on historical operation of the conveyor system.
10, 12, and 14	Evaluate surface runoff and soil deposition that may have occurred during plant operation or as a result of building demolition from the upgradient former Building 503 and 503A conveyor belt area to the south (toward the wetlands). These samples will be placed in low lying areas where upgradient surface runoff would likely converge/collect.
16	remediated (excavated and removed) discharge area (former Site 7 area). This sample will be placed at the most upgradient point of the drainage area to confirm surface runoff and building demolition did not result in recontamination of the previously remediated drainage area.
17 and 18	Evaluate soil characteristics beneath former Building 375. No floor drains were located within this building and there was no known release within this area; therefore, 2 discrete sample locations are recommended to confirm no release has occurred.
19	Evaluate surface runoff and soil deposition that may have occurred during plant operation or as a result of building demolition from the upgradient Building 375 to the south (toward the wetland). This sample will be placed in a low lying area where upgradient surface runoff would likely converge/collect.
20, 23, and 32	within the former conveyor belt area. The two edge samples (Sample 20 and Sample 32) will be biased toward the respective buildings because it is believed to be most likely to to have received contamination based on historical operation of the conveyor system.
21, 22, 26, and 31	Evaluate soil characteristics beneath the footprint of the former conveyor belt 505A located south and west of Buildings 504/505. It is unknown if a release has occurred; therefore, 4 discrete sample locations are recommended within the former conveyor belt area.
24	Evaluate surface runoff and soil deposition that may have occurred during plant operation or as a result of building demolition from the upgradient former 502A conveyor belt area to the south (toward the wetlands). This sample will be placed in a low lying area where upgradient surface runoff would have likely converged/collected.
25	Evaluate soil characteristics at the discharge location from drainage feature located south of former Buildings 504 and 505. This sample will be collected at the base of the corrugated metal pipe extending from the base of the soil berm that connects to the concrete drainage feature located south of the buildings.
27	Evaluate soil characteristics beneath former Building 505 and former Building 505. No floor drains were located within this building and there were no known releases associated with this area; therefore, 1 discrete sample location is recommended.
28 and 29	Evaluate soil characteristics from the most likely loading/unloading zone associated with Buidlings 504 and 505. It is unknown if a relase has occurred; therefore, 1 discrete sample location is recommended from the area north of each buidling.
30	Evaluate soil characteristics beneath former Building 504 and former Building 505. No floor drains were located within this building and there were no known releases associated with this area; therefore, 1 discrete sample location is recommended.
33	Evaluate soil characteristics beneath former Building 2008. No floor drains were located within this building and a there is no known release associated with this area; therefore, 1 discrete sample location is recommended from the building footprint to confirm no release has occured.
34, 35, 38, 39	Evaluate soil characteristics beneath former Building 502. Two floor drains were located within this building; therefore, 4 discrete sample locations are recommended to determine if a release has occurred. Two of these sample locations will placed at the approximate location of the former floor drains.
36 and 37	Evaluate soil characteristics from the most likely loading/unloading zones associated with Buidling 502.It is unknown if a relase has occurred; therefore, 2 discrete sample locations are recommended from the area north of the building.
40	Evaluate surface runoff and soil deposition that may have occurred during plant operation or as a result of building demolition from the upgradient former Building 502 to the south (toward the wetlands). This sample will be placed in a low lying area where upgradient surface runoff would likely converge/collect.
Outfalls 1-4	Evaluate soil/sediment characteristics at each downgradient outfall (NR 016, 018, 018A, and 006A). One discrete sediment sample will be collected from the first depositional area downgradient of each outfall.