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LETTER AND THE U S NAVY RESPONSE TO THE U S EPA REGION III COMMENTS ON
THE DRAFT PROPOSED PLAN SITE 22 GROUNDWATER THE BURN PAD NWS
YORKTOWN VA
03/14/2012
CH2M HILL

March 14, 2012

Mr. Moshood Oduwole
Federal Facility Remediation (3HS11)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Subject: Response to Comments *draft Proposed Plan Site 22 Groundwater: The Burn Pad Naval Weapons Station Yorktown, Yorktown, Virginia, January 2012*

Dear Mr. Oduwole

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 EPA's comments on the subject document provided in the e-mail dated February 25, 2012. All requested editorial comments and comments with regards to figures and tables will be incorporated as requested.

SPECIFIC COMMENTS:

Comment #1 – [Section 1, 2d paragraph]. Please delete first sentence ("This plan summarizes.."). It repeats a sentence at the end of the paragraph. Eliminate repetition

Response: The first sentence was removed as suggested.

Comment #2 – [Section 1, 5th para, 1st sentence] Please replace "groundwater; NFA RODs" with "groundwater and NFA RODs". Also, please insert "that" between "surface water" and "have already been signed."

Response: This replacement was made as suggested.

Comment #3 – [Section 2, Previous GW Invest.] Please delete 2d sentence ("Detailed information from these . . ."). This repeats a sentence in Section 1, para. 5.

Response: The 2d sentence was deleted as suggested.

Comment #4 – [Section 3, 2d para (i.e., the para just before section 3.1)]. Please add a sentence like this at the end of the para: "However, the Commonwealth of Virginia regards all groundwater as a potential drinking water source."

Response: The sentence, "However, the Commonwealth of Virginia regards all groundwater as a potential drinking water source" was added to the text.

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Comment #5 – [Section 3.1, 1st para.] *Why no discussion of RDX concentrations? Also, in the sentence about heptachlor epoxide, it's not clear whether more than one sample exceeded the RSL. I think so, but it's also possible to read as only one sample exceeded the RSL. Please clarify.*

Response: A discussion of the RDX concentrations was added to the text. Further, the sentence about heptachlor epoxide has been clarified by stating that more than one sample exceeded the RSL.

Comment #6 – [Section 3.2, 1st para.] *Why no discussion of migration of RDX?*

Response: A discussion of the migration of RDX is now included in the text.

Comment #7 – [Section 3.3, 1st para, 3rd sentence.] *Please delete comma between "; and" and "VOC concentrations"*

Response: The comma between “and “VOC concentrations” was removed from the text of the PRAP as suggested by EPA.

Comment #8 – [Section 5, 1st par.]. *Please rewrite end of sentence like so: "from actual or threatened releases of hazardous substances (TCE, VC, and RDX) into the environment." This tracks the language of the statute and guidance better.*

Response: This sentence was rewritten in accordance with the recommendation from the EPA.

Comment #9 – [Section 5.1, 1st para, last sent.] *Correct misspelling: "indentifies". Also, please replace "a non-cancer hazard" with "an acceptable non-cancer hazard"*

Response: The misspelling was corrected in the text.

Comment #10 – [Section 5.1, 4th para, 1st sentence.] *Please rewrite the end like so "were above the acceptable limits." Not only cancer risks, but also non-cancer risks, were above acceptable limits.*

Response: The sentence was rewritten to say “were above the acceptable limits”.

Comment #11 – [What is Human Health Risk box.] *Please correct typo "non-=cancer"; delete equal sign.*

Response: The typo was corrected in the text.

Comment #12 – [Table 3.] *Why does it not give non-cancer risks for adult and child residents?*

Response: The table was revised to show the non-cancer risks for adult and child residents.

Comment #13 – [Short-term protectiveness.] *At beginning of paragraph, please compare periods of time needed to achieve protectiveness.*

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Response: All technologies will take approximately 6 and 8 weeks to implement. This information was added to the text of the "Short-term protectiveness" section

Comment #14 – [Section 9.] At the end, please add the following statement (from Proposed Plan checklist, page 3-16 of EPA's 1999 ROD guidance):

Based on information currently available, the Navy believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other alternatives with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with ARARs ; 3) be cost-effective; 4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable; and 5) satisfy the preference for treatment as a principal element."

Response: This text was added to the end of the proposed plan.

If you have any questions or comments regarding the enclosed documents, please feel free to contact Bill Friedmann at 757-671-6223 or me at 757-671-6267.

Sincerely,

CH2M HILL

Stephanie Sawyer
Project Manager

cc: Mr. Jim Gravette/NAVFAC
Mr. Wade Smith/VDEQ
Mr. Bill Friedmann/CH2M HILL
Project File