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Baker

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August 26, 1994

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Commonwealth of Virginia
Department of Environmental Quality
629 East Main Street
Richmond, Virginia 23219

Attn: Mr. Stephen Mihalko
Remedial Project Engineer

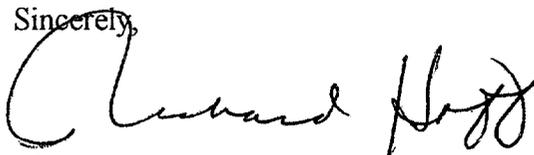
Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0209
Draft Final Record of Decision for Site 5, Surplus Transformer Storage Area Comments
Naval Weapons Station Yorktown, Yorktown, Virginia

Dear Mr. Mihalko:

Baker Environmental, Inc. (Baker) and the Navy are pleased to present response to Commonwealth of Virginia Comments on the Draft Final Record of Decision for Operable Unit Number 1, Site 5, Surplus Transformer Storage Area, Naval Weapons Station Yorktown, Yorktown Virginia. Comments presented by Ms. Lisa Ellis on the Draft Record of Decision dated April 27, 1994 have been addressed either directly or indirectly as a result of USEPA Region III comments and public involvement. The rationale used in addressing the April 27 1994 comments on the Draft Record of Decision are presented herein. A Final Record of Decision is currently being reviewed by the Commanding Officer at WPNSTA Yorktown.

Should you have any questions concerning these responses, please do not hesitate to contact me at (412) 269-2099.

Sincerely,



Richard Hoff
WPNSTA Activity Coordinator
RFH/jsl

cc: Mrs. Brenda Norton, LANTDIV - Navy Technical Representative
Ms. Valerie Walker, WPNSTA
Mr. Robert Thomson, USEPA



A Total Quality Corporation

**Response to Comments
Draft Record of Decision
Site 5, Surplus Transformer Storage Area
Naval Weapons Station Yorktown, Yorktown, Virginia**

**Virginia Department of Environmental Quality
Stephen Mihalko, Remedial Project Engineer**

Letter dated August 18, 1994

General Comment

1. The 8 comments submitted on the Draft Record of Decision (ROD) letter dated April 27, 1994 from Lisa Ellis were considered in subsequent submissions of the ROD. The attached specific responses indicate changes to the Draft Final ROD and/or Final ROD which address VDEQs concerns.
2. The typographical error on page 10-1 will be corrected in the Final ROD.

Specific Comments (Lisa Ellis letter dated April 27, 1994)

1. Page A-1: The risk evaluation conducted for Site 5 indicates that no current or future potential unacceptable risks are associated with residual levels of PCBs detected in Site 5 soils. CERCLA section 121(c) calls for reviews within 5 years of initiation of a remedial action if hazardous substances or contaminants remain at a site after the remedial action step. Because the risk assessment indicates that current or future adverse risks will not occur at Site 5, CERCLA 121 is not triggered and the 5 year review period is not required.
2. Page A-2: Page A-2 has been corrected in the Final ROD.
3. Section 4: Section 4.0 is complete in the Final ROD and community participation is described in Section 10. Responsiveness Summary.
4. Page 5-1: Text has been modified in Section 3.0 of the ROD to address concentrations equal to or exceeding 1000 ug/Kg and the TSCA clean soil standard. Changes to Section 5.0 are not necessary because the risk assessment supports Section 5.0 text.
5. Page 7-2, 2nd paragraph: Agreed. Text was corrected.
6. Page 9-1: Agreed. Text was corrected.

7. Comment acknowledged.
8. Site or site areas at which EPA has determined that no action is necessary should allow for unrestricted use of or unlimited access to the area or have in place appropriate exposure controls from a previous action to ensure that no unacceptable exposures will occur.

The Site 5 Risk Evaluation Report determined that future residential exposure to Site 5 soils (which assumes that no fence exists) will not pose an unacceptable risk. Therefore, no provision for maintaining the fence is necessary to ensure protectiveness.