

6/25/07-02059



COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 1105, Richmond, Virginia 23218
Fax (804) 698-4500 TDD (804) 698-4021
www.deq.virginia.gov

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

June 25, 2007

Linda Cole, P.E.
NAVFAC Mid-Atlantic, Building N-26, Room 3208
Hampton Roads Restoration Product Line, Code OPHREV4
9742 Maryland Avenue
Building N-26, Room 3208
Norfolk, VA 23511-3095

**RE: Draft Perchlorate White Paper
Naval Weapons Station Yorktown
Yorktown, Virginia
EPA ID No. VA8170024170**

Dear Ms. Cole:

The Virginia Department of Environmental Quality (DEQ) has received the *Draft Perchlorate White Paper* (Draft White Paper) for Naval Weapons Station Yorktown, Yorktown, Virginia. The December 2006 Draft White Paper, prepared by CH2M HILL and Baker Environmental, Inc., was received by the DEQ (electronically) on December 18, 2006.

Thank you for providing the DEQ's Office of Remediation Programs the opportunity to review the above-referenced Draft White Paper. Subsequent to DEQ's internal review, this office has the following comments:

Page ii:

Please change to: 1.1 Naval Weapons Station Yorktown History and Mission
Please change to: 6.1.3 Plant 3

Page iii:

Please change to: 3 – Summary of Perchlorate Sampling at Dahlgren NSWC
Please change to: 4 – WPNSTA Yorktown NERP Sites with Possible Perchlorate Contamination
Please insert a "List of Figures"

Page iv:

Please change to: ABL Allegany Ballistics ~~Coordinator~~ Laboratory

Page v:

Please change to: WPNSTA Naval Weapons Station

Page 1:

Please change to: ...Naval Weapons Station (WPNSTA) Yorktown, Yorktown, Virginia.

Please change to: 1.1 Naval Weapons Station Yorktown History and Mission

Page 3:

Please indicate where “Perchlorate has been detected in groundwater and surface water;”

Page 6:

Please change to: ...a final risk-based dose...

Page 7:

Please change to: ...DoD established 24 ppb in water as the current level of concern (LOC)...

Page 8:

Please revise text that indicates, “sampling continues today.”

Page 9:

The text indicates that the method detection limit for perchlorate in drinking water is 4 ppb. Then, the text states that there were positive detections of perchlorate in surface water, all below the reporting limit of 4 ppb. Please include a discussion on why the drinking water analysis and surface water analysis have different method detection limits for perchlorate.

Please indicate when the 170 wastewater samples were analyzed.

Please indicate when the 92 surface water samples were tested.

Please include a summary table of perchlorate sampling at ABL (i.e. Table 3).

Page 11:

Please insert a reference to Attachment D in Section 6.2.

Page 12:

Please indicate the total number of NERP sites at WPNSTA Yorktown (20 or 21).

Page 13:

Please clarify that SSA 2 – Former EOD Disposal Area and SSA – 19 Beaver Road/Ponds 11 and 12 Drainage Area and Environs are being considered one NERP Site. The Navy’s Thermal Treatment Unit (TTU) lies within the boundary of SSA 19 [March 2007 Site Management Plan]. Please include a “Site History” of SSA 19 and/or the Navy’s TTU.

Please change to: SSA 17 – Building 1456 Mark 46 ~~Torpedo Shop~~ Waste Otto Fuel ~~Storage~~ Tank [March 2007 Site Management Plan].

Page 14:

Please include an additional explanation on why perchlorate sampling and analysis in groundwater should not be performed at “High Potential” Site 7.

Please include a discussion on what perchlorate sampling and analysis in groundwater will be performed at “High Potential” Site 9 and SSA 19/Navy’s TTU.

Section 7.1 indicates that a groundwater investigation is not planned for Site 25, but Table 5 indicates that a groundwater investigation is planned for Site 25. Please clarify.

Please change to:...LOC for perchlorate of 24 ppb in water until such time...

Page 15:

Please clarify that SSA 2 – Former EOD Disposal Area and SSA – 19 Beaver Road/Ponds 11 and 12 Drainage Area and Environs are being considered one NERP Site. The Navy’s Thermal Treatment Unit (TTU) lies within the boundary of SSA 19 [March 2007 Site Management Plan].

Please contact me at (804) 698-4125 or wmsmith@deq.virginia.gov with any additional questions.

Sincerely,

Wade M. Smith
Remediation Project Manager
Office of Remediation Programs

cc: Robert Thomson, EPA