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CH2MHILL

September 24, 2009

Mr. Wade Smith
Remedial Project Manager
Office of Remediation Programs
Virginia Department of Environmental Quality (VDEQ)
P.O. Box 1105
Richmond, Virginia 23218

Subject: Response to VDEQ Comments on *Draft Technical Memorandum Consensus for No Further Action in Soil and Groundwater, Site 11 – Bone Yard; Naval Weapons Station Yorktown; Cheatham Annex; Williamsburg, Virginia*

Dear Mr. Smith,

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received via redline mark-up on August 31, 2009 regarding the subject document.

1. Comment: *Report Cover, Report Spine, and Cover Letter should reference Site 11 – Bone Yard.*

Response: The document has been updated to reflect the correct site name.

2. Comment: Page 1, Site History: Format Figure 1 to be bold and blue.

Response: The text has been revised accordingly.

3. Comment: Page 1, Site History: Revise 6th sentence of first paragraph to read: “Removal actions, conducted in 1986 and 1997, included the disposal of....”

Response: The text has been revised accordingly.

4. Comment: Page 2, Section 3.1.1, 1st sentence: Insert the word “to” between exposure and site.

Response: The text has been revised accordingly.

5. Comment: Page 4, Section 3.2.3: Will risks associated with arsenic in surface water be addressed as part of Penniman Lake?

Response: No. Although the Step 3 ERA identified arsenic as a COPC in Penniman Lake surface water, the maximum total concentration of this chemical is less than the current freshwater Ambient Water Quality Criteria for the Protection of Aquatic Life and arsenic was not detected in dissolved surface water samples (which best reflect the bioavailability of this metal) from the lake. The following text was added between the third and fourth sentences of Section 3.2.3: “The maximum total concentration of arsenic is less than the current freshwater Ambient Water Quality Criteria for the Protection of Aquatic Life and arsenic was not detected in dissolved surface water samples (which best reflect the bioavailability of this metal) from the lake.”

6. Comment: Page 5, Section 4, 3rd paragraph, 2nd sentence: Replace “regulators” with “USEPA and VDEQ Remedial Project Managers”.

Response: The text has been revised accordingly.

7. Comment: Page 6, Section 5.1.3, 2nd paragraph, 2nd sentence: Define TDS.

Response: The text has been revised to define TDS as total dissolved solids.

8. Comment: Page 7, References: Cannot have two (Shaw, 2009) references.

Response: The text has been revised to differentiate between Shaw 2009 documents. Additionally the Shaw CCR reference has been updated to reflect current document status.

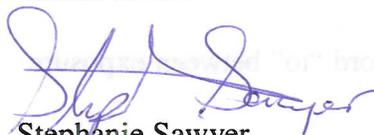
9. Comment: Page 9, Consensus Statement: This is not the title of this Tech Memo.

Response: The text has been revised to reflect the correct document title.

If you have any questions or comments regarding the above response to comments, please feel free to contact me at 757-671-6273.

Sincerely,

CH2M HILL



Stephanie Sawyer
Project Manager

cc: Mr. Chris Murray/NAVFAC
Ms. Sue Haug/USEPA
Ms. Marlene Ivester/CH2M HILL