



**DEPARTMENT OF THE NAVY**

ATLANTIC DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1510 GILBERT ST  
NORFOLK, VA 23511-2699

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TELEPHONE NO

(757) 322-4751

IN REPLY REFER TO

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DEC 23 1998

Environmental Protection Agency  
Federal Facilities Branch  
Attn: Mr. Robert G. Thomson (3HS50)  
1650 Arch Street  
Philadelphia Pennsylvania 19103-2029

Dear Mr. Thomson:

Thank you for the opportunity to review EPA's document entitled "Sampling Plan Number 1, USN Supply Center Cheatham Annex, Williamsburg, Virginia" dated October 27, 1998. The Navy's comments are of two types, the first being general concerns regarding the EPA's proposed sampling effort of DuPont's Penniman Shell Loading Plant, and the second being technical comments regarding information contained in the Sampling Plan.

The Navy's has two general concerns regarding this sampling plan. The first concern is that the sampling effort should be conducted in a manner that would allow the Fleet Industrial Supply Center, Cheatham Annex (FISC CAX) to be evaluated and scored for the National Priorities List (NPL) separate from the other properties in the area (i.e. Department of the Interior (DOI), Commonwealth of Virginia, York County, etc.). Our second concern is that since the site under investigation is a combination of land owned by the DOI, the Commonwealth of Virginia, and York County, that this site should not be referred to as the "U.S. Navy Fleet Industrial Supply center, Cheatham Annex". The Navy feels that the correct title to this land under investigation should be the "Penniman Shell Loading Plant in Williamsburg".

**Technical Comments:**

(1) The sampling plan indicates that samples are only being taken from property owned by either Navy or DOI. Paragraph 1.0 states that "This first sampling event will address the most significant areas of concern." Are there any plans to sample the York County and Commonwealth of Virginia property in the future? We request samples be taken from York County and Commonwealth of Virginia property.

(2) So that proper notice is given to FISC CAX personnel, is this sampling effort still scheduled to begin on January 11, 1999? What is the expected duration of the sampling operation?

(3) Paragraph 2.2 states that the site is divided between the United States Navy, Department of Interior, National Park Service, the United States Army (Camp Peary) and the Virginia Department of Emergency Services. No information has been found that would suggest that either one of the DuPont World War I facilities in the Williamsburg area (Penniman Shell Loading facility or the TNT factory) occupied land currently owned by Camp Peary. Unless EPA has information to the contrary, it is requested that Camp Peary be deleted from this narrative.

(4) Sampling Map. It is recommended that an overall map be included in the sampling plan so that Details A-F may be located without having to refer to the old Penniman maps.

(5) Table 1, Samples PENI-SO-13 & 14. These samples (12-18" deep, 24-36" deep) are to be taken within 200 feet of an occupied building. How is it anticipated that these samples be taken? Utilities will need to be located in this area. Has EPA scheduled a utility locator service to scan the area prior to sampling?

The Navy would like to re-schedule the 18 December 1998 meeting that EPA had to postpone, so that we may discuss the current status of the HRS scoring package for Cheatham Annex, as well as the Navy's position on the possible listing of Cheatham Annex on the NPL. We would like to meet as early in January as possible. In addition, we would like to requests that copies of all sampling data and results taken as part of this investigation be forwarded to us, so

that the information can be incorporated into the existing environmental database for Cheatham Annex.

If you have any questions, please free to contact the Mr. Bob Schirmer, P.E. at (757) 322-4751.

Sincerely,

*Bob Schirmer*

*for* N. M. JOHNSON, P.E.  
Head  
Installation Restoration Section  
(North)  
Environmental Programs Branch  
Environmental Division  
By direction of the Commander

Copy to:

VDEQ (Ms. Sharon Wilcox)

CAX (LT Doug Collier)

Baker Environmental Inc. (Mr. Marty Taube)

COMNAVBASE Norfolk (Ms. Cherryl Barnett, REC)

WPNSTA Yorktown Environmental (Ms. Carolyn Neill)

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