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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Date: April 20, 1994

Ms. Brenda Norton, PE
Atlantic Division, Naval Facilities Engineering Command
Environmental Quality Division
Code: 1822
Building N 26, Room 54
1510 Gilbert Street
Norfolk, Va 23511-2699

Re: Naval Weapons Station, Yorktown, Va.
Forwarding of the VDEQ's *Bioaccumulation Initiative* Study

Dear Ms. Norton:

Per our recent telephone conversation, enclosed please find photocopied pages containing the sampling results from a Virginia Department of Environmental Quality (VDEQ) sampling event(s) at the Naval Weapons Station-Yorktown, which were published in the VDEQ's March 31, 1994 *Bioaccumulation Initiative in Virginia's Coastal Zone Management Area* study. After preliminarily reviewing the Commonwealth's results, its appears that the conclusions drawn in Weston's July, 1993 draft *Focused Biological Sampling and Preliminary Risk Evaluation* for the Naval Weapons Station may need to be re-visited in light of VDEQ's conclusions. PCBs were detected in fish tissue taken from the Roosevelt Pond. Additionally, the Commonwealth found bioaccumulation of contaminants in amphibian tissue. EPA is aware of the Mabee's salamander as being a federally endangered species identified on the Weapons Station, and we will additionally inquire into the possibility of any endangered amphibian species being present on the Weapons Station.

The VDEQ's sampling results strongly suggest that Roosevelt Pond and the immediate area surrounding the pond need to be investigated, and the prioritization of the investigation of Roosevelt Pond re-calculated based upon the VDEQ's sampling results. This could be accomplished during the submittal of the Naval Weapons Station's draft *Site Management Plan* for FY 1995-1996. Regardless, the obvious conclusion is that EPA, the Navy, and the VDEQ need to meet and discuss our available options based upon the new analytical data. Possibly, the Navy's risk assessment specialists could also be involved in a brainstorming meeting over how to proceed with Roosevelt Pond.

I believe the good news is that the VDEQ sampling event did not find any significant contaminants at Ponds 10, 11, and 12. It should be pointed out that the VDEQ single sampling locations placed at these three ponds do not make a strong case for any final conclusions concerning whether the ponds present a risk to human health or the environment, but the results do help with the prioritization of investigations at the Naval Weapons Station.

I am attempting to have complete copies of this two volume study made and distributed to the Navy as quickly as I can. In the meantime, the Navy may want to try obtaining a complete copy set from the VDEQ. It should also be noted that there were a number of "unusual" contaminants detected in and around Roosevelt Pond that are included in the analytical results tables of the study.

If you have any questions, concerns, or comments, please feel free to call me at (215) 597-1110,

Sincerely,

Robert Thomson

Robert Thomson, PE
VA/WV Superfund Federal Facilities (3HW71)

cc: Lisa Ellis (VDEQ, Richmond)
Jennifer Loftin (WPNSTA, Code 09E)
Andy Rola (BVWST, Phila.)