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(757) 322-4778

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U. S. Environmental Protection Agency
Region III
Attn: Mr. Robert G. Thomson, P.E.
Remedial Project Manager (3HW50)
VA/WV Superfund Federal Facilities Section
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Re: Response to Comments on the Draft 1997-1998 Site Management Plan (SMP), Naval Weapons Station Yorktown, Yorktown, Virginia

Dear Mr. Thomson:

This letter is provided in response to your July 22, 1996 letter providing comments on the Draft 1997-1998 SMP. Building 109 (AOC-C) and Building 109 Trenches and Piping (SWMU 179) have not previously been included in any of the Site Management Plans. We do not believe that this was an oversight. A recent conversation with the previous NWS Yorktown RPM (Ms. Brenda Norton) indicated that all parties agreed at least verbally that Bldg. 109 and the associated trenches would not be investigated as separate entities on a micro scale. Rather, they would be included in the Site 6 Remedial Investigation. It had been discussed in the past to concentrate on investigating the impacts that Site 6 operations had on the environment (i.e. the impoundment area and surrounding area).

The December 1992 RCRA SWMU Investigation does not provide solid justification or reasons to specifically target the subject areas as a separate entity or on a micro scale. We believe that the current Site 6 Remedial Investigation adequately encompasses and addresses any historic "release" from SWMU 179 and AOC-C.

Additionally, the bottom section of Section 6.1(I) of the FFA states that SWMUs 50, 51, and 52, and SWMUs 142 and 143 are subject to a "separate RI". However, SWMUs 50, 51, and 52 (Site 22) and SWMUs 142 and 143 which are the large and small incinerators (respectively) associated with Site 12 have not been nor have they been proposed to be studied on a micro level. The ash and debris which was deposited in the ravine in the back of the incinerators, and the subsequent potential impacts to human health and the environment was the focus of the study effort. Building 109 and the associated trenches pose a very similar situation. The primary release pathway for constituents of concern at Site 6 was the drainage channel and the receiving impoundment area. This area has been thoroughly investigated.

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We believe building 109 and the trench itself do not currently pose the threat of a release nor do they continue to act as a source of contamination. Again, the reasons provided in the 1992 RCRA report to study these units separately are very weak and highly speculative. We do not agree that we should independently target SWMU 179 and AOC-C for a separate Remedial Investigation study for the above mentioned reasons.

In accordance with Section 20.1 of the FFA we recommend that we resolve this issue informally at the Project Manager or immediate supervisor level if you do not agree with this response. We will await your verbal or written response to this letter before acting further on the issue. If you have any questions concerning this matter, please contact Mr. Richard Stryker at (757) 322-4778.

Sincerely,

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

Copy to:
VDEQ (Mr. Steve Mihalko)
WPNSTA Yorktown (Mr. Jeff Harlow, Code 09E)
Baker Environmental, Inc. (Mr. Rich Hoff)

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