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Date: May 1, 1995

Mr. Jeff Harlow  
Yorktown Naval Weapons Station  
Environmental Assurance Department  
Building 31-B  
Code: 09E  
P.O. Drawer 160  
Yorktown, Virginia 23691-0160

Re: Naval Weapons Station - Yorktown, Va.  
Hydrogeologic Framework Study

Dear Mr. Harlow:

Pursuant to the Environmental Protection Agency's (EPA's) review of the draft USGS Hydrogeologic Framework Study proposal for the Naval Weapons Station-Yorktown, the EPA offers the following comments:

- (1) The scope of the draft proposal is very broad and unfocused. The proposal should be refined to specifically state what the objectives of the framework proposal are and how those objectives will be met, i.e. through the issuance of deliverables, etc. The proposal should, at the very least, define what specific tasks are to be accomplished by the USGS. More importantly, the proposal should define the priority for the performance of individual tasks, including a schedule outlining the timeframe for the completion of individual tasks.
- (2) EPA believes the Hydrogeologic Framework Study should be designed to support the efforts of the Installation Restoration Program, as well as supporting the needs of the Naval Weapons Station. Geophysical studies utilizing existing wells would be a useful addition to current IRP data for the ongoing investigation of the Naval Weapons Station. For those areas requiring groundwater remediation, such information is crucial for the development of groundwater models, which ultimately lead to the development of a feasibility study and issuance of a Record of Decision(s).
- (3) EPA urges the Navy to consider exploring alternative/innovative technologies to remediate contaminated groundwater at the Naval Weapons Station. An *in-situ* bioremediation study to determine if either a vertical circulation or passive groundwater remediation system will achieve clean-up goals for site-specific groundwater contamination at the Naval Weapons Station should begin as soon as possible if the Navy is considering utilizing an *in-situ* groundwater remediation technology. Such studies could conceivably take up to two years to complete.

This concludes EPA's review comments on the draft USGS Hydrogeologic Framework Study proposal for the Naval Weapons Station-Yorktown. While EPA supports the notion of performing some form of hydrogeologic framework study for the Naval Weapons Station, the nature and function of EPA dictates that we suggest that such a Framework support environmental clean-up activities at the Station. EPA also cannot wholly support such a proposal until we have had the opportunity to review a detailed scope or Work Plan outlining the specific activities or tasks that would be accomplished as part of the Framework Study. In general, EPA believes that a detailed, task-specific proposal for the USGS performance of activities at the

Naval Weapons Station will serve to illustrate to the Parties involved with restoration activities at the Naval Weapons Station actually what the goals are of the Hydrogeologic Framework Study and will enable the Parties to "buy-in" to the proposal with a clear understanding of the direction of the Study will take.

If you have any questions concerning EPA's comments, please feel free to call me at (215) 597-1110,

Sincerely,

A handwritten signature in black ink that reads "Robert Thomson". The signature is written in a cursive style with a large, prominent "R" and "T".

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

cc: Bruce Rundell (USEPA, 3HW13)  
Brenda Norton (LANTDIV, Code 1822)  
Steve Mihalko (VDEQ, Richmond)