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Mr. Robert Thomson, P.E., R.E.M.
Office of Federal Facility Remediation
United States Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Subject: Response to Comments *Draft Site Management Plan, Fiscal Years 2008-2009*
Naval Weapons Station Yorktown and Cheatham Annex
Yorktown, Virginia

Dear Mr. Thomson:

This letter is in response to your comments on the subject document provided in your letter dated 10 September 2007. Comments are presented, shown in italics, followed by the Navy's response.

- 1) *Table 2-2 Cheatham Annex - AOC 6 Penniman AOCs. Please note that the Penniman AOCs, as listed in Table 2-2, including (a) the Ammonia Settling Pits; (b) the TNT Graining House Sump; (c) the TNT catch (note spelling error) box ruins; (d) waste slag material; and (e) 1918 drum storage area, are Source Areas on the NPL. As such, they are required to have an RI, risk assessment, Proposed Plan, and ROD in order to be de-listed. Currently, they are described on Table 2-2 as AOCs, which may be misleading.*

The Navy agrees that the Penniman AOC subareas were identified as Source Numbers 4 through 8 and were scored in the HRS evaluation [HRS Document Record (NPL-U31-2-3-R3)]. However, the Navy feels the Federal Facility Agreement (AR document 01666.pdf) supersedes the HRS for documenting how the Navy will implement CERCLA at Cheatham Annex. Appendix A of the Cheatham Annex FFA identifies AOC 6 as a site screening area under the Site Screening Process (SSP). If it is determined that there is not a CERCLA release with potential for unacceptable risk, the SSP allows for a no further action decision document that does not require public participation. This is consistent with NCP Preliminary Assessment and the SSP as described in the CAX FFA:

"MM. "Site-Screening Process" or "SSP" refers to the mechanism described in Subsection 9.3 for evaluating whether identified SSAs should proceed with an RI and FS. The SSP encompasses both the Facility's RCRA AOCs and SWMU areas and newly discovered CERCLA AOCs within the Facility. Appendix A lists those

geographical areas and any additional areas agreed to by the Parties in the future that are being evaluated under the SSP.”

Therefore, it is not required to follow the RI/FS/PP/ROD documentation path, unless the Site Screening Process indicates a CERCLA release with potential unacceptable risks and an RI is warranted.

Spelling error noted and corrected.

- 2) Section 4.2.18 – *The description of the 5 Penniman sites should include a discussion of the designation of these 5 areas as Source Areas on the NPL.*

While the Navy acknowledges that the Penniman AOCs were identified in the HRS scoring process, as noted in response to comment 1, these AOCS are identified in the FFA as site screening areas in the SSP. The Navy believes adding HRS information to the write-up would be confusing as the SMP is a primary document associated with the FFA, which addresses these sites under CERCLA.

Sincerely,

CH2M HILL



Marlene Ivester
Project Manager

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