

2/14/2008 - 02314



COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 1105, Richmond, Virginia 23218
Fax (804) 698-4500 TDD (804) 698-4021
www.deq.virginia.gov

David K. Paylor
Director
(804) 698-4000
1-800-592-5482

February 14, 2008

Linda Cole, P.E.
NAVFAC Mid-Atlantic, Building N-26, Room 3208
Hampton Roads Restoration Product Line, Code OPHREV4
9742 Maryland Avenue
Norfolk, VA 23511-3095

**RE: Draft Expanded Site Inspection Report
for the Closed MWR Skeet Range
Naval Weapons Station Yorktown, Yorktown, Virginia
and the Closed Marine Pistol and Rifle Range
Cheatham Annex, Williamsburg, Virginia**

Dear Ms. Cole:

The Virginia Department of Environmental Quality (DEQ) has received the *Draft Expanded Site Inspection Report* (Draft ESI Report) for the Closed MWR Skeet Range, Naval Weapons Station Yorktown (WPNSTA Yorktown), Yorktown, Virginia and the Closed Marine Pistol and Rifle Range, Cheatham Annex (CAX), Williamsburg, Virginia. The October 2007 Draft ESI Report, prepared by CH2M HILL, was received by the DEQ on October 31, 2007.

Thank you for providing the DEQ's Office of Remediation Programs the opportunity to review the above-referenced Draft ESI Report. Subsequent to DEQ's internal review, this office has the following comments:

Contents - Figures:

- | | | |
|-------------------|-------------|--|
| Please insert: | <u>2-1</u> | Location of WPNSTA Yorktown and CAX |
| Please change to: | <u>2-12</u> | MWR Skeet Range Location Map |
| Please change to: | <u>2-23</u> | MWR Skeet Range Features |
| Please change to: | <u>2-34</u> | Marine Pistol and Rifle Range Location Map |
| Please change to: | <u>2-45</u> | Marine Pistol and Rifle Range Features |

2.1.2 – Closed MWR Skeet Range Location and History:

Please include a discussion on the anticipated future land use planned for the site. During the November 15, 2007 WPNSTA Yorktown/CAX Partnering Meeting, it was stated that the site is within the Explosive Safety Quantity Distance (ESQD) of the explosives loading pier and that the closed MWR Skeet Range will not be used for residential development. If this statement is still accurate, it should be included in the *Final ESI Report*.

2.1.3 – Closed MWR Skeet Range Geology and Hydrogeology - Hydrogeology:

Please change to: ...no borings have actually been completed within the range boundary,...

3 – Field Investigation:

Please indicate when the field activities were conducted.

Please include a discussion on the results of the visual survey that was performed at each of the closed ranges.

3.1 – Metal Detector Survey:

Please include a discussion on the significance of selecting a metal detector with a maximum depth of detection of one foot.

Please include a discussion on the methodology of the metal detector survey that was performed at each of the closed ranges.

Please include a discussion on the results of the surface and/or subsurface soil samples that were collected from the location where the metal detector identified metallic objects.

3.3 – Sieve Analysis:

Please include a discussion on the significance of collecting sieve analysis samples from a depth of three inches.

4 – Release Assessment Decision Analysis:

Please indicate if the laboratory analytical reports will be included in the *Final ESI Report*. If not, please include a reference to the Administrative Record location of the laboratory analytical reports.

4.1.3 – Step 3 – Surface Soil:

Please change the Benzo(a)pyrene concentration to: 190 J $\mu\text{g}/\text{kg}$.

4.2.3 – Step 3 – Surface Soil:

Please change the Zinc concentration to: 90.1 J $\mu\text{g}/\text{kg}$.

4.2.3 – Step 3 – Subsurface Soil:

Please change the Zinc concentration to: 62.2 J $\mu\text{g}/\text{kg}$.

4.2.3 – Step 3 – Surface Soil:

Please indicate that three detections exceeded the background UTL and the ecological screening values for Zinc.

4.2.3 – Step 3 – Subsurface Soil:

Please indicate that two detections exceeded the background UTL and the ecological screening values for Zinc.

4.2.4 – Step 4 – Ecological Risks:

Please change to: ...seven of 41 surface soil sample locations and three of ~~26~~ 25 subsurface soil locations...

5.1 – MWR Skeet Range:

Please change to: ...two of 24 surface soil samples...

Please delete: ~~No PAH concentrations exceeded ecological screening values.~~ (There are no ecological screening values for PAHs.)

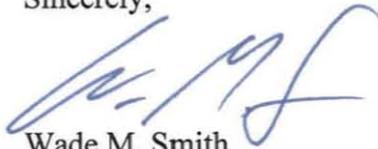
5.2 – Marine and Pistol Rifle Range:

Please change to: ...(seven of 41 surface soil samples and three of ~~26~~ 25 subsurface soil samples)...

Please change to: ...(two of ~~31~~ 28 surface soil sample locations and three of 31 subsurface soil samples)...

Please contact me at (804) 698-4125 or wmsmith@deq.virginia.gov with any additional questions.

Sincerely,



Wade M. Smith
Remediation Project Manager
Office of Remediation Programs

cc: Robert Thomson, EPA