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LETTER AND COMMENTS FROM U S EPA REGION III ON RESPONSE TO COMMENTS
REGARDING DRAFT SITE INSPECTION SAMPLING AND ANALYSIS PLAN PENNIMAN
LAKE CHEATHAM ANNEX FISC WILLIAMSBURG VA
04/19/2011
U S EPA REGION III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Susanne Haug, P.E.
NPL/BRAC Federal Facilities Branch

Direct Dial (215) 814-3394
Mail Code: 3HS11

Date: April 19, 2011

Ms. Krista Parra
NAVFAC MIDLANT, Code OPHREV4
9742 Maryland Avenue, Bldg N-26
Norfolk, VA 23511-3095

Re: Responses to the Navy's Responses to Comments submitted in a letter dated February 24, 2011 regarding the *Draft Site Inspection Sampling and Analysis Plan, Penniman Lake; Naval Weapons Station Yorktown Cheatham Annex, Williamsburg, Virginia*; November 2010

Dear Ms. Parra:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced letter and would like to submit the following comments.

1. The response to comment #2 is not adequate. The comment indicates that because of the distance between sample locations (e.g. ~150-450 feet) and the variability of contaminant concentrations in different samples, it is uncertain there is sufficient spatial coverage of sediment within Penniman Lake. The response states "Sediment sample locations were selected to provide sufficient spatial coverage across the lake...." This response does not adequately address the comment.
2. The response to comment #3 is too general. Please explain how the contractor/Navy defines the source, as used in the phrase "...the source of PCBs in Penniman Lake." "Source" may be defined generally, as in "the Navy"; or more specifically, as in building X or activity Y. The text does not indicate what the path forward will be if PCB sources are not identified, but unacceptable levels of PCBs are in Penniman Lake. This issue needs to be addressed.
3. The response to comment #4 is unclear. PCBs have already been detected in sediment in Penniman Lake. Therefore, upgradient samples are already justified. The response states that as shown in the Step 1 decision tree (Figure 5), upgradient samples will be identified and collected if PCBs are detected in sediment. Therefore, there is no option but to collect upgradient samples based on the detection in sediment. A meeting of the partnering team is not necessary to address this decision point. The text on Worksheet #10 on page 37 should reflect the information in the decision tree.
4. The response to comment #5 raises an additional concern. According to the response, the sediment samples from this SI "will primarily be used to determine how the spatial distribution of PCBs relate to these source areas/transport pathways and if/how the concentrations and/or spatial distribution of PCBs in the lake have changed from the 2000 Pond Study...." It is not clear if the data planned for collection can reasonably be

used to show changes in PCB concentrations over a 10-11 year time frame. This has to do with sample locations as well as the variability of PCB concentrations between sediment samples. This needs to be re-addressed.

5. The response to comment #7 also raises an additional concern. The way(s) in which PCB Aroclor data can be used to determine source(s) needs to be more specifically detailed, particularly as it is being used to justify that PCB congener analysis is not needed in the SI.
6. In another study, involving another Superfund Site (Metal Bank) in EPA Region III, the Aroclor data was found to underestimate total PCB concentrations and a correction factor (1/0.6) was developed. If Aroclor data are to be used at Penniman Lake, a similar correction factor may need to be developed such that more accurate total PCB concentrations can be used for decision making.

The Navy's responses to comments not mentioned above are adequate. If you have any questions, please call me at (215) 814-3394.

Sincerely,

A handwritten signature in black ink, appearing to read "Susanne Haug". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Susanne Haug, P.E.
NPL/BRAC Federal Facilities Branch

Cc: Wade Smith (VaDEQ, Richmond)