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FISC WILLIAMSBURG
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LETTER AND U S EPA REGION III COMMENTS ON THE SITE 4 PRE-FEASIBILITY STUDY
TECHNICAL MEMORANDUM FISC WILLIAMSBURG VA
07/17/2015
U S EPA REGION III PHILADELPHIA PA



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

July 17, 2015

Mr. Tom Kowalski
NAVFAC MIDLANT, Building N-26
Attention: Code OPHE3
9742 Maryland Avenue
Norfolk, VA 23511-3095

Subject: Site 4 Pre-Feasibility Study Technical Memorandum, Naval Weapons Station Yorktown
Cheatham Annex, Williamsburg, Virginia, March 2015

Mr. Kowalski:

Thank you for the opportunity to review the subject document. Attached are EPA's comments on the document. If you have any questions, please contact me at 215-814-2077.

Sincerely,

A handwritten signature in blue ink, which appears to read "Gerald F. Hoover".

Gerald F. Hoover, RPM
NPL/BRAC Federal Facilities Branch

cc: Wade Smith, VDEQ

BTAG Comments:

1. On page 2, the TM states that polychlorinated biphenyls (PCBs) may have been transported to and deposited within the drainage channel from an unknown source. A similar statement is made on page 10. It was BTAG's understanding that runoff from Site 9 (Transformer Storage Area) flowed into Upstream Pond and was the likely source of PCBs found at Site 4. Therefore, there is a potential source within the vicinity that could have impacted the site and this information needs to be added to this section and any other section within the report that states that the source of the PCBs is unknown.

TOX Comments:

Principal Comment:

1. Proposed actions on page 11 appear appropriate and supported by the evidence and analysis in the document.

Additional Comments:

2. Generally helpful if a table of the soil samples incorporated into the analyses of the risk for soils outside the fence (attachment 1) and for soils outside the fence and debris areas (attachment 2). This would improve the transparency of the document. In addition, specify if samples were considered 'inside' or 'outside' the fenced area; this was difficult to follow throughout the pre-FS.
3. Page 2 – The remedial investigation is described as '2012' and referenced as '2014.' Please clarify throughout document.
4. Page 3, Previous Investigations, last 4 bullets – The last 4 bullets in this section highlight the recommendations from the RI and do not include soil at Site 4; however, the RI concluded that the FS should address buried debris and potentially unacceptable risks associated with potentially site-related COCs in soil and groundwater. Please clarify.
5. Page 9 – First paragraph under "Non-CERCLA-Regulated Sources" – Delete 'large' in "A large component of stormwater..." The contribution of the various stormwater routes was not quantified and describing as "large" is a mischaracterization of the evidence.
6. Attachment 1, Table 5.1 – oral-to-dermal adjustment factor for vanadium is 2.6%, not 100%, according to RSL summary table.