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COMMONWEALTH of VIRGINIA

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February 23, 2000

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attn.: Mr. Bob Schirmer, P.E.
Code 1822

RE: Draft Final No Further Response Action Planned
Site 9 – Transformer Storage Area
Naval Weapons Station Yorktown, Cheatham Annex Site
December 17, 1999

Dear Mr. Schirmer:

Thank you for the opportunity to review and comment on the above referenced document. The following is a list of my comments as we discussed earlier today.

1. An additional 4 samples will need to be taken to verify that the contamination is not present in deeper soils, and to confirm that the levels at the surface are at or below the levels detected in the previous sampling events. These samples should be fully validated as well. I suggest that one set of samples be taken in a low lying area of the ditch draining the site where there appears to be a higher organic content. The samples should be obtained at 0-6" bgs and from 12-24" bgs. The second set should be obtained from a likely "hot spot" within the fenced area. The samples should be obtained at the same depths. This should compensate for any surface disturbances, grading or gravel, which may have occurred and confirm or refute the suitability of the data previously obtained.
2. Public notice, including a newspaper advertisement, public comment period, public meeting and Responsiveness Summary, as applicable, needs to be performed. Recommended guidance is titled *A GUIDE TO PREPARING SUPERFUND PROPOSED PLANS, RECORDS OF DECISION, AND OTHER REMEDY*

SELECTION DECISION DOCUMENTS, and can be obtained at
www.epa.gov/superfund/resources/remedy/rods.

3. The exact boundaries of the site need to be defined relative to a permanent reference. Use of latitude and longitude, reference to a survey marker, and exact dimensions of the site, e.g. 11' by 24', would serve. On Figure 2, please indicate the boundaries of the site, including affected areas of the drainage ditch.
4. Section 2.4 describes surface water bodies at Cheatham Annex (CAX) but does not identify the drainage pathway from Site 9 to a surface water body. This information should be included in the document. Also, since it is not known for certain when the "ponds" were constructed, it would be more accurate to state "After 1943 ..." rather than "In 1943...".
5. The document does not address ecological impacts or the lack thereof. Please address this issue.
6. The screening level RBC for residential use is 0.32 mg/kg for AROCLOR 1260. For the purposes of this document that is equivalent to 321 ug/kg, the highest concentration detected. In order to simplify the report, you may wish to omit the risk calculations and stop at the screening stage. If you chose to keep the risk assessment section in the document, I recommend including the value for the 95% UCL in section 3.1.
7. The Declaration section of the document needs to address threat to the environment as well.

If you have any questions or require further information, please contact me at the numbers below.

Very truly,



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February 23, 2000
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CC: Rob Thompson, Region III, EPA
file: 1999 - Ceatham Annex
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