



CH2MHILL

August 2, 2010

389659.RP.DR

Mr. Wade Smith
Remedial Project Manager
Office of Remediation Programs
Virginia Department of Environmental Quality (VDEQ)
P.O. Box 1105
Richmond, Virginia 23218

Subject: Response to Comments on the *Draft Record of Decision, Site 11: Bone Yard, Naval Weapons Station Yorktown Cheatham Annex, Williamsburg, Virginia*

Dear Mr. Smith:

On behalf of the U.S. Department of the Navy's Naval Facilities Engineering Command (NAVFAC), CH2M HILL has prepared this letter in response to your July 19, 2010 e-mail that provided comments for the subject document via track changes in the document's Word file. Comments received are shown in italics, followed by the Navy's response in blue.

❖ *Comment #1 - [Document-wide] sediment vs. sediments...please use consistently throughout the document.*

Response: The text has been updated to consistently reference the media as 'sediment.'

❖ *Comment #2 - [Section 1, 1st sentence] As mentioned during the July 13, 2010 CAX Partnering Meeting, I was curious as to why the Proposed Plan made no reference to Site 11 as OU 5.*

Response: The USEPA tracks sites in their CERCLIS database as Operable Units (OU). The EPA RPM requested that the site's OU designation be included on the ROD cover and within Section 1 so if someone is looking for ROD in USEPA's archive, they will be able to find it easier. Therefore, it is included on the ROD as a courtesy and will not be included in any other site document. The sudden reference to an OU on a site's ROD can lead to confusion, so the following changes will occur:

1. Front Cover: From "Operable Unit 5, Site 11: Bone Yard" to "Site 11: Bone Yard (USEPA Operable Unit 5).
2. Section 1, first sentence changed to: "... No Further Action (NFA) for all media (soil, groundwater, surface water, and sediment) at Environmental Restoration Program (ERP) Site 11, Bone Yard (also known as USEPA Operable Unit 5), at Naval Weapons Station ..."

- ❖ Comment #3 - [Section 2.1, 1st paragraph, 3rd sentence] *If CAX was not commissioned until 1943, please indicate how the property was used differently between 1940 and 1943.*

Response: The 1984 Initial Assessment Study (IAS) for CAX states after the Penniman Shell Loading Plant closed (1918), the property was used for farming or left idle until 1942 when construction began for a new Navy supply facility. Table 2-1 of the IAS reports the Site 11 period of operation as "1940-1978." However, later in the document when providing the site description (Chapter 8), it states:

"It is not known how long the site had been used for waste disposal, as no records are available regarding its operation. Available information indicates that the site was active from the World War II era until as recently as 1978."

Consequently, the following changes to the ROD text will occur:

1. Section 2.1, first paragraph, third sentence will change to: "Between 1923 and 1942, the property was used for farming or left idle until construction began in 1942 for a new Navy supply facility. CAX was commissioned in 1943 as a satellite unit of the Naval Supply Depot in Norfolk, VA to provide . . ."
 2. Section 2.1, second paragraph, fifth sentence will change to: "The 1984 Initial Assessment Study (IAS) reported Site 11's period of operation as from 1940 to 1978; however, it also stated it was unknown how long Site 11 was used for waste disposal, but available information indicated the site was active from the World War II era until 1978. Site 11 was reportedly used by the CAX Department of Public Works . . ." (rest of the paragraph will remain the same)
- ❖ Comment #4 - [Section 2.1, 2nd paragraph, second to last paragraph] *Whose Public Works?*

Response: The Department of Public Works, adjacent to Site 11, is a part of CAX. The text was revised to clarify (see above).

- ❖ Comment #5 - [Section 2.1, Figure 2] *Please consider using Figure 3-5 from the June 2010 Draft SMP (which includes Focus Areas and Sampling Locations) instead of the current figure.*

Response: Figure 3-5 was not directly used as it is not a comprehensive representation of site activities. The intent of Figure 2, as indicated in the text, is to depict Site 11 as it is related to site characteristics and pertinent landmarks. Information shown in SMP Figure 3-5 is provided in subsequent figures in the ROD. No changes were made to the text.

- ❖ Comment #6 - [Section 2.3, 1st paragraph, last sentence] *Additional sites or an additional AOC?*

Response: Since the FFA was signed, additional AOCs have been added to the ERP, but not additional sites. The sentence has been revised to:

"However, since the FFA was signed, two additional AOCs (AOCs 8 and 9) have been added to the ERP."

The sentence a few sentences prior to the one above has also been revised to:

"Subsequently, the Navy, USEPA, and VDEQ identified seven additional potential source areas and designated them as AOCs 1 through 7."

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- ❖ Comment #7 - [Section 2.3, 2nd paragraph] Please include a reference to AOC 9 in the paragraph above.

Response: Done. Please see the response to Comment #6.

- ❖ Comment #8 - [Section 2.6.1, Table 3] Please define [$\mu\text{g}/\text{L}$].

Response: The definition for " $\mu\text{g}/\text{L}$ " has been added underneath the table.

- ❖ Comment #9 - [Section 2.6.2, last paragraph] Please include [Ref. 22] in References.

Response: The reference has been added.

- ❖ Comment #10 - [Section 2.8, 3rd paragraph] [Please verify the Public Affairs Office phone number, as different from one in Proposed Plan (757 322-4785).]

Response: The phone number cited in the Proposed Plan is actually the number for the Administrative Record File and not the Public Affairs Office. The Public Affairs Office phone number listed in the ROD is correct.

- ❖ Comment #11 - [Section 3, References Table] Please indicate why AR numbers are "Pending" for every document referenced after 2000.

Response: These AR numbers were not readily available for some of the documents, but have since been added to the table.

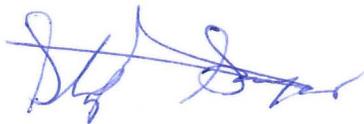
- ❖ Comment #12 - [Section 3, References Table] Move [Ref. 10] to after Ref. 11.

Response: This reference has been moved in the table to be after Ref. 12, since that is how it falls within the main document text, and References 10, 11, and 12 have been renumbered accordingly, in the table and the main document text. In addition, the reference text in the table has been revised as necessary to match its citation within the main document.

With the exception of the request to delete "42 U.S.C §§9601 et seq.," from the second sentence of Section 1, all editorial changes were made and are not discussed on a case by case basis within this letter. The requested deletion was not retained, as it is a USEPA addition to the document. If you have any questions or comments regarding the above responses, please feel free to contact me at 757-671-6273.

Sincerely,

CH2M HILL



Stephanie Sawyer
Project Manager

cc: Ms. Susanne Haug/USEPA
Mr. Christopher Murray /NAVFAC
Ms. Marlene Ivester/CH2M HILL