



CH2MHILL

August 2, 2010

389659.RP.DR

Ms. Susanne Haug  
Remedial Project Manager  
United States Environmental Protection Agency, Region 3  
1650 Arch Street (3HS11)  
Philadelphia, PA 19103-2029

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

Dear Ms. Haug:

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. All individual editorial changes have been made and are not discussed on a case by case basis within this letter.

❖ *Comment #1 - [Section 2.2, Table 1] Full citations to all the studies summarized here must be in the references. They were relied on to make the remedial decisions.*

**Response:** Citations have been provided in the References Table located at the end of the ROD for all documents discussed within Table 1.

❖ *Comment #2 - [Section 2.2, Table 1] [Dames and Moore, 1986] not in references*

**Response:** As requested, Table 1 and the References Table were updated to cite this study, the Step 1 A Confirmation Study Round 1.

❖ *Comment #3 - [Section 2.2, Table 1] [Dames and Moore, 1988] not in references*

**Response:** As requested, Table 1 and the References Table were updated to cite this study, the Step 1 A Confirmation Study Round 2.

❖ *Comment #4 - [Section 2.2, Table 1] COPC = "Contaminant of Potential Concern" in the NCP. Why do Navy RODs change "contaminant" to "constituent." Is there a Navy guidance document instructing remedial staff to do that?*

**Response:** All instances of 'Constituent of Potential Concern' have been changed to 'Contaminant of Potential Concern.'

- ❖ Comment #5 - [Section 2.2, Table 1] Define Abbreviations [in the] legend of Figure 3.

**Response:** The requested changes to Figure 3 have been made in order to clarify the legend.

- ❖ Comment #6 - [Section 2.2, Table 1] [The Technical Memorandum Consensus for No Further Action in Soil and Groundwater] needs to be included in [the] references. (It's the most important basis for the decision in the ROD).

**Response:** As requested, Table 1 and the References Table were updated to cite this document.

- ❖ Comment #7 - [Section 2.5, 4<sup>th</sup> sentence] We've deleted [the] sentence ["Future industrial, recreational, and operational land use activities may be implemented on the site provided that activities remain protective of human health and the environment."] because it includes a risk evaluation conclusion that is premature in the document (the risk section is the next section). Also, the conclusion of the sentence deleted implies a conflict with the ROD as a whole. The ROD concludes that there is no unacceptable risk posed to human health or the environment by site conditions under any land use scenario but the sentence implies that there exists land uses that may not remain protective of [human health] and the [environment]. I assume that the sentence is wrong and the ROD conclusion is correct??

**Response:** Correct, the conclusions stated in the ROD are accurate. The text has been updated to reflect that current site conditions allow for unrestricted future land use.

- ❖ Comment #9 - [Section 2.6] [The No Further Action Technical Memorandum] needs to be in the references.

**Response:** As with Comment #6, Table 1 and the References Table were updated to cite this document.

- ❖ Comment #10 - [Section 2.6.1, 4<sup>th</sup> paragraph, 3<sup>rd</sup> to last sentence] Please spell out [the RSL] acronym or define here if needed.

**Response:** The requested changes have been made to the text.

- ❖ Comment #11 - [Section 2.6.1, 4<sup>th</sup> paragraph, last sentence] Please make ["agreed to eliminate arsenic, iron and manganese as COCs"] bold, italic and include in references.

**Response:** As requested, Table 1 and the References table were updated to cite the signature page of the *Technical Memorandum Consensus for No Further Action in Soil and Groundwater*.

- ❖ Comment #12 - [Section 2.6.1, Table 3] Need a reference to the background study.

**Response:** As requested, Table 3 and the References Table were updated to cite the Background Investigation.

- ❖ Comment #13 - [Section 2.6.1, Table 3] Delete the line of space [between "\*Dissolved fraction" and the J qualifier definition].

**Response:** The requested changes have been made to the text.

- ❖ Comment #14 - [Section 2.6.1, last paragraph, 2<sup>nd</sup> sentence] Why would [“and the fact that the source of contamination at Site 11 was removed during the NTCRA”] be relevant for the HHRA? The driver for the NTCRA was ecological risk.

**Response:** The removal of the source area within Site 11 was included in the discussion of the HHRA because it presents an additional line of evidence supporting the absence of unacceptable risk to human health.

- ❖ Comment #15 - [Section 2.6.2, 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence] Not clear what the significance of [“consisted of Steps 1 through 3b’] is. How many steps is an ERA? Is this all the steps or only a few of them?

**Response:** As outlined in Navy and USEPA ERA policy and/or guidance, Steps 1 through 3 are only part of the three-tiered, eight- step process to evaluate the potential risks to ecological receptors. Steps 1 and 2 are the Screening Level ERA [or SERA (or SLERA)], while Step 3 is the first step in a Baseline ERA (or BERA). Starting with Step 2, as each step is completed, it is decided (by risk assessors and/or the Partnering Team) if future courses of action (i.e., additional steps) are necessary. For Site 11, Steps 1 to 3 were sufficient to characterize the ecological risks and further steps were not needed. It is common to cite how far in the ERA process a site progressed. However, since the ROD presents no discussion of the ERA step process, the sentence was revised as follows to avoid any confusion:

“The Ecological Risk Assessment (ERA) for Site 11 was conducted in accordance with Navy and USEPA policy and guidance.”

- ❖ Comment #16 - [References, Ref. 6] The [AR] number [hasn’t] been assigned yet?? It’s been 3 years since the document was put into the AR.

**Response:** The References Table has been updated with the current list of AR numbers for all documents, as available.

- ❖ Comment #17 - [References, Ref. 8] [2008 or] 2009? As in table 1?

**Response:** Yes, the date is 2009, as shown in Table 1, and the References table has been corrected.

Ms. Susanne Haug

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If you have any questions or comments regarding the above response to comments, please feel free to contact me at 757-671-6273.

Sincerely,  
CH2M HILL

A handwritten signature in blue ink, appearing to read 'Stephanie Sawyer', is written over a horizontal line.

Stephanie Sawyer  
Project Manager

cc: Mr. Christopher Murray /NAVFAC  
Mr. Wade Smith/VDEQ  
Ms. Marlene Ivester/CH2M HILL