

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
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Date: September 15, 2009

Mr. Christopher Murray
NAVFAC MIDLANT, Code OPHREV4
9742 Maryland Avenue, Bldg N-26
Norfolk, VA 23511-3095

Re: Review of Technical Memorandum, Consensus for No Further Action in Soil and Groundwater,
Site 11 – Old DuPont Disposal Area, Naval Weapons Station Yorktown Cheatham Annex,
Williamsburg, Virginia, August 2009

Dear Mr. Murray:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document and accepts the conclusions of the report. The EPA would, however, like to submit the following two comments for the record. No response is necessary.

1. Per page 5 of the report, the highest concentrations of risk drivers in groundwater (arsenic, iron, and manganese) were detected in wells "hydrologically upgradient" of the site. Of these drivers, arsenic poses the greatest potential risk and also exceeds its MCL (10 ug/L). From Figure 5, dissolved concentrations of arsenic (up to 16.6 ug/L) have remained fairly consistent over time, based on samples collected in 1999 and 2002. Although arsenic was not detected in downgradient wells, nor were observed levels outrageously high, these findings are not typical of background conditions in this region of the U.S.
2. Based on potential impacts to ecological receptors, a Non-Time Critical Removal Action was performed for soil at the site. While no unacceptable risks to humans were triggered at Site 11, it should be noted that the ecological clean-up goal established for total PAHs (18,000 ug/kg) would not necessarily be acceptable for human receptors. Again, this does not impact the decisions made for Site 11, but could affect the selection of clean-up goals for PAHs at other sites at the Facility.

If you have any questions, please call me at (215) 814-3394.

Sincerely,

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

Cc: Wade Smith (VaDEQ, Richmond)