

NWS-00308 - 08.01 - 12/07/93



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Date: December 7, 1993

Ms. Brenda Norton, PE
Atlantic Division, Naval Facilities Engineering Command
Environmental Quality Division
Code: 1822
Building N 26, Room 54
1510 Gilbert Street
Norfolk, Va 23511-2699

Re: Naval Weapons Station, Yorktown, Va.
Review of revised draft *Site Management Plan*
Fiscal Years 1994 and 1995

Dear Ms. Norton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Navy's December 1, 1993 revised draft *Site Management Plan* (SMP) for the Naval Weapons Station - Yorktown NPL site, and we offer the following comments and concerns:

GENERAL COMMENT

1. During the upcoming SMP meeting, scheduled for December 14, 1993, EPA proposes that the Parties, i.e. the State of Virginia, the EPA, and the Navy, discuss the possible acceleration of finalizing the investigation of Site 18. A simplified sampling scheme may suffice in moving this Site towards a ROD.

SPECIFIC COMMENTS

Page 2-4, Section 2.1.4

1. Is the Open Burning Facility and environs (SWMUs 50, 51, and 52), as well as the Foliage Burn area (AOC G) included in an upcoming RI for Site 4? If so, please include this information in the final SMP.

Page 2-5, Section 2.1.6

2. Is Building 109 (AOC C) and the piping associated with Building 109 (SWMU 179) included with Site 6? If so, please include this information in the final SMP.

Page 2-6, Section 2.1.11

3. Are the Large Incinerator (SWMU 142) and the Small Incinerator (SWMU 143) included in Site 12? If so, please include this information in the final SMP.

Pages 5-9 through 5-12, Figures 5-1 through 5-4

4. Please include target dates for the initiation of field activities for the listed non-time critical removal actions.

Page 5-10, Figure 5-2

5. Please note that, as of the date of this letter, EPA has not received the *Removal Action Work Plan* referred to in this figure. The only document EPA has received concerning the non-time critical removal action planned for Sites 2, 9 and 22 is a *Health and Safety Plan*.

Page 5-25, Figure 5-14

6. Please accelerate the schedule for the development of Treatability Study Work Plans and the performance of Treatability Studies/Pilot demonstrations. Currently, the Treatability Study Work Plans listed in figure 5-14 are scheduled to be finalized by 7/3/95, and the performance of a Treatability Study(ies) and the issuance of a Treatability Study Report by 6/14/96. In comparison, Figure 5-12 lists the draft Feasibility Study Report for sites 6 and 7 to be delivered to EPA by 1/2/96. Basically, the draft Treatability Study Report should be finished by the time the draft Feasibility Study Report is issued. EPA believes it reasonable to assume that a Treatability Study Work Plan could be developed independent of on-going RI activities, and the performance of the actual Treatability Study should not be wholly dependent on having a final RI. Therefore, we recommend accelerating the schedule by at least six months to a year.

This concludes EPA's comments on the revised draft *Site Management Plan* for the Naval Weapons Station - Yorktown. If you have any questions, please feel free to contact me at (215) 597-1110,

Sincerely,



Robert Thomson, PE
VA/WV Superfund Federal Facilities (3HW71)

cc: Lisa Ellis (VDEQ, Richmond)
Jennifer Loftin (WPNSTA, Code 09E)