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COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

Peter W. Schmidt
Director

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December 21, 1995

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
ATTN: CODE 1822, Mr. Richard Stryker
Norfolk, VA 23511-2699

Re: Draft-Final Site Screening Process Report for Site
Screening Areas 1, 6, 7, and 15, Naval Weapons Station
Yorktown, Yorktown Virginia.

Dear Mr. Stryker:

Thank you for providing the Department of Environmental
Quality, Federal Facilities Section the opportunity to comment on
the above referenced report. Attached are our comments on the
report.

If you have any questions, please feel free to contact me at
(804) 698-4202 or Richard Criqui at (804) 698 4013.

Sincerely,

A handwritten signature in blue ink that reads "Stephen Mihalko".

Stephen Mihalko
Remedial Project Engineer

cc: Rob Thomson, EPA Region III
Jeff Harlow, NWS Yorktown
Erica Dameron
Richard Criqui

Naval Weapons Station, Yorktown (NWSY), VA - Draft Final Site Screening Process Report For Site Screening Areas 1, 6, 7, & 15, November 8, 1995 - Staff Review Comments

Section 7.0, Results And Conclusions

1. This section of the SSP Report needs to include figures and tables to better summarize the voluminous text and appendices. The tables need to show the chemicals of potential concern (COPC) and the figures need to show the areal extent of the hot spots, areas of pending removal actions, and further investigations through RIFSSs, etc.

Section 5.0, Nature And Extent Of Contamination

2. Figures 5-1, etc. show cPAH and nPAH with no accompanying table clearly delineating the compounds that comprise cPAH and nPAH. Tables need to be provided that relate the list of compounds that comprise cPAH and nPAH in the narrative text. (For the general public and record.) Each figure noting cPAH and nPAH should reference the above table number and page number. Use of the above table in conjunction with tables in Section 5.0 allows readers the ability to cross reference data. The other alternative is to include a companion table for each figure relating the cPAH and nPAH for each sample in each figure. (Similar to the last SSP Report.)
3. In addition, the Figures 5-1, etc. are titled Positive Detections of Select Organic Compounds in Surface Soils, etc. Should the titles be changed to Positive Detections of Organic Chemicals of Concern to better relate to the terminology used elsewhere in the report?

Section 2.0, Site History And Results of Previous Investigation

4. The second paragraph on page 2-5 makes reference to a water/sediment sample (12SW/SD08) that was collected in the tributary of Ballard Creek southwest of the SSA (Figure 2-6). This part of the narrative text needs to be corrected by the consultant since this part of the text (Section 2.1.3) is in reference to SSA 7, not SSA 15.
5. The title for Tables 2-1 and 2-2 should reflect that they are tables for TCLP analyses of soil samples.

SSA 1- Building 428 Teague Road Disposal Area

6. SSA 1 is recommended for an RI/FS. The RIFS should include both surface and subsurface soils to further delineate the extent of the contamination and to develop an appropriate remedy selection, removal action, or remedial action.

7. In addition, the RIFS is to include a habitat evaluation of the unnamed tributary to better define the stream (drainage ditch), to identify potential exposure pathways and ecological

SSA 6 - Aviation Field and Environs

8. An RIFS is warranted in the vicinity of the helo pad. A final decision regarding groundwater at SSA 6 should await findings associated with the RIFS.
9. During the conference call on December 18, it was decided that an additional evaluation of the low level explosive contaminants found in SSA 6 groundwater would be made under the planned groundwater evaluation associated with nearby Sites 6 and 7. This fact should be made clear in the report Results and Conclusions and Executive Summary to provide an audit trail for a continued investigation.
10. The Results and Conclusions state that RI/FS efforts are not recommended for the sludge disposal area and the current storage area. This Section of the Report should summarize the rationale for these stated positions.

SSA 7 - Building 373 Rocket Plant/ Group 18 Magazines/ Main Disposal Area

11. A removal action of the Underground Storage Tank (UST) near Building 373 within SSA 7 is scheduled for this fiscal year. This report should include more complete discussion of this planned Removal Action in the Executive Summary and in Section 7.0, Results and Conclusions. In addition, the appendices should include: a copy of the approval letters from the EPA and the DEQ regarding this removal action along with a listing of documentation associated with the removal action. This audit trail is believed necessary for continuity and for the benefit of the general public.
12. A RIFS is warranted to investigate subsoil and groundwater contamination in the vicinity of the UST that is scheduled for a removal action. The HI for groundwater at the UST site should be further assessed during the RIFS of that site.
13. The ecological impact of the past discharge to surface waters from the rocket plant (Bldg. 373) needs to be further assessed in a RIFS for this site or under a more complete evaluation under this SSP Report.

SSA 15 Sewage Treatment Plant No. 1/Sludge Drying Beds and Discharge Area

14. During the conference call, it was recommended that investigation of trichlorethene surrounding site SSA 15 should be brought into the scope of the investigation of Site 12. A work plan associated with a hydropunch investigation will be

submitted for Site 12 and SSA 15. (This fact should be discussed more clearly in the Final SSP Report in Section 7.0 and the Executive Summary.)

15. The EI values for SSA 15 sediments and surface waters were 99.0 and 0.03 respectively. The high EI may be associated with the past discharge from the abandoned STP; levels may be such to warrant a removal or remedial action. Federal Facilities Staff recommends that the NWSY further assess the significance of the EI associated with the SSA 15 sediments in a RIFS work plan. The RIFS could be done with the ecological work planned for SSA 1 or could be included in the expanded study of Site 12.