

1/11/96-02406

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11 JAN 1996

Commonwealth of Virginia  
Department of Environmental Quality  
Attn: Mr. Stephen Mihalko-4th Floor  
Federal Facilities Project Officer  
629 E. Main Street  
Richmond Virginia 23219

Re: Response to Comments on the Draft Final Site  
Screening Process (SSP) Report for Site Screening  
Areas (SSAs) 1, 6, 7, and 15, Naval Weapons Station  
Yorktown, Yorktown, Virginia

Dear Mr. Mihalko:

The Navy is pleased to provide responses to comments for the  
subject report.

If you have any questions concerning these responses to your  
comments on the Draft Final SSP Report for SSAs 1, 6, 7, and  
15, please contact Mr. Richard Stryker at (804) 322-4778.

Sincerely,

N. M. JOHNSON, P.E.  
Head, Installation Restoration  
Section (North)  
Environmental Programs Branch  
Environmental Quality Division  
By direction of the Commander

Enclosure

Copy to:  
WPNSTA Yorktown (Mr. Jeff Harlow, Code 09E)  
EPA Region III (Mr. Robert Thomson, P.E.)  
Baker Environmental, Inc. (Mr. Rich Hoff)

Blind copy to:

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deqpfrsp.rns

**RESPONSE TO COMMENTS SUBMITTED BY VDEQ  
ON THE DRAFT FINAL SSP REPORT FOR  
SSAs 1, 6, 7, AND 15  
NAVAL WEAPONS STATION YORKTOWN  
YORKTOWN, VIRGINIA**

**COMMENT LETTER DATED DECEMBER 21, 1995**

1. Agreed. Tables and figures that summarize chemicals of potential concern (COPCs) and show the areal extent of hot-spots and pending removal actions will be included in Section 7.0.
2. Agreed. Tables listing the compounds that comprise cPAH and nPAH will be included in Section 5.0.
3. The Final SSP Report submittal will be made in the form of replacement pages. Only pages of text and figures that change from the Draft Final to the Final versions will be submitted. Although "Contaminants of Concern" may more accurately describe the nature of the figures in Section 5, contaminants of concern are selected as part of the risk assessment section. Titling figures in Section 5 in this fashion may cause confusion when COPCs are identified later in the report and figures are not all inclusive.
4. This paragraph will be moved to the appropriate section of the discussion regarding SSA 15.
5. Agreed. The table titles will include reference to the TCCP analyses.
6. The Executive Summary and Section 7.0 of the Final SSP Report will include recommendations for RI/FS activities at SSA 1, as discussed during the December 18, 1995 conference call. Meeting minutes from this conference call are attached.
7. Agreed. Please refer to the response to Comment No. 6.
8. Agreed. The Executive Summary and Section 7.0 of the Final SSP Report will include recommendations for RI/FS activities at SSA 6, as discussed during the December 18, 1995 conference call. Meeting minutes from this conference call are attached.
9. Agreed. The Executive Summary and Section 7.0 of the Final SSP Report will include text explaining that evaluation of groundwater at SSA 6 will be incorporated into the evaluation of groundwater at Sites 6 and 7.
10. Agreed. Section 7.0 will include additional discussions of the rationale for no further action in these areas.
11. Agreed. The Executive Summary and Section 7.0 of the Final SSP Report will include a more complete discussion of the planned removal action at SSA 7. Regulatory comments along with a listing of documentation associated with the removal action will be included in the appendices.

12. Agreed. The Executive Summary and Section 7.0 of the Final SSP Report will include recommendations for RI/FS activities at SSA 7, as discussed during the December 18, 1995 conference call. Meeting minutes from this conference call are attached.
13. Agreed. Please refer to the response to comment No. 12.
14. Agreed. The Executive Summary and Section 7.0 of the Final SSP Report will include a detailed discussion regarding the incorporation of SSA 15 into the work being conducted at Site 12.
15. This will be included in the expanded study for Site 12.

**Meeting Minutes  
Conference Call  
SSAs 1, 6, 7 and 15  
Naval Weapons Station Yorktown  
December 18, 1995**

**Participants:**

Jeffrey Harlow	-	NWSY Environmental Directorate
Richard Stryker	-	LANTDIV
Robert Thomson	-	USEPA Region III
Steve Mihalko	-	VDEQ
Rich Criqui	-	VDEQ
Rich Hoff	-	Baker Environmental

The Conference Call began at 9:00 a.m. with a discussion of possible changes to the Final Site Screening Process (SSP) Guidelines. Mr. Criqui indicated that a change to the SSP Guidelines on a case-by-case basis would create problems from an administrative standpoint and would be in conflict with the FFA. Mr. Hoff indicated that changes to the SSP Guidelines might be necessary because of budgetary constraints being imposed on the Navy. As an example, Mr. Hoff discussed the case of SSA 7, the Main Road Disposal Area/Building 373 Rocket Plant, where a removal action is scheduled in Fiscal Year 1996. Contamination detected at the SSA is concentrated around an UST located adjacent to Building 373. The UST will be addressed as part of the removal action, a condition not anticipated by the current SSP Guidelines. If the removal action is successful in eliminating the source, is it prudent to suggest that the SSA be made a site and possibly delay a final action? Or, could an action be taken after post removal confirmation sampling data are received without nominating the SSA as a site? In this case, the removal action addresses the most significant potential source of contamination (i.e., the UST), however, following the SSP Guidelines could, at other SSAs, result in delays because of funding and a low potential source area to remain in place. At this point, Mr. Thomson asked if funding for the removal included any controls with respect to contaminated groundwater at the SSA. Mr. Stryker responded that it did not. Mr. Hoff then inquired about Phasing the Final SSP Report to include removal action data or acquiring additional data at borderline SSAs. Mr. Criqui suggested modifying the Draft Final or Final SSP Report delivery dates rather than creating a phase II deliverable. After more discussions concerning SSA 7, it was decided that even after the removal action at the UST that additional RI efforts would be necessary to address a potential groundwater problem. Because the source will be removed the urgency to take an immediate action is minimized and that the SSP Guidelines could address the situation without modification. It was agreed that SSA 15 would be nominated as an IR site for additional RI efforts with respect to soils and groundwater around the UST only. Removal action data can be incorporated into the RI Report for the SSA as a site at a later date. Mr. Criqui did not feel that the data would be too old by that time to be used as such.

Mr. Hoff brought up SSA 15 which had one high positive result for TCE in a side-gradient surface water body. This SSA may be influenced by sources in the industrial area located to the west-northwest of the SSA. This SSA is likely similar to Site 12, which is affected by the presence of TCE in groundwater because of operations in the industrial area. The Site 12 will be expanded to account for upgradient sources of TCE in groundwater as well as sources of TCE to Ballard Creek. As a result, SSA 15 will be included in the expanded Site 12 study area.

Mr. Criqui indicated that, with regards to linking SSA15 with the additional work at Site 12, this should be presented in more detail in the SSP Report. This will be accomplished in the Final SSP Report. Mr. Hoff indicated that there would be a letter addendum to the Site 12 Work Plan to discuss additional work in the expanded Site 12 area. Once the data from the Site 12 hydro punches is available, another conference call will take place to discuss well locations and additional sampling.

Mr. Criqui asked whether the Imhoff tank was still present at SSA 15. Mr. Hoff indicated that it was still present, but was not part of the SSA as defined by the FFA. Mr. Criqui noted that no samples were collected from the tank. Mr. Harlow indicated that water is currently in the tank, but there is no information regarding what is present at the tank bottom (sludge, etc.). Mr. Hoff indicated that a sample could be collected from the base of the tank, which could then be compared to groundwater samples collected at SSA 15.

Mr. Criqui indicated that he was satisfied with the approach for SSA 15. Mr. Mihalko asked what the status was of the trickling filter (which reportedly had a mercury-containing bearing). Mr. Harlow indicated that, although this was not part of the original SWMU, he would check with public works personnel on the status, and if possible have it removed. Mr. Hoff indicated that mercury was not retained as an COPC at SSA 15.

Mr. Hoff discussed results of the SSP at SSA 1. This SSA will be nominated as a site, but a focused RI will be suggested to account for the vertical extent of carcinogenic polyaromatic hydrocarbons (CPAHs) in soil and the ecological habitat of the drainage ditch (particularly where it flows into the York River). Additionally, the removal action has been completed at SSA 1, which may have had an influence on the drainage ditch. Mr. Criqui indicated that the VDEQ ecologist(s) would like to be on site during the proposed habitat evaluation. Mr. Stryker agreed to this.

Mr. Stryker asked whether or not there was sufficient data to conduct a risk assessment, or would more samples be required. Mr. Hoff indicated that there could be enough data, and the "RI/FS activities" doesn't necessarily mean the full-blown RI/FS process. Mr. Thomson agreed, and stated that if the data is in hand, there is no reason to do additional sampling. The existing data can be used to move the SSA to a focused FS. Samples can always be collected right before finalization of the FS.

Mr. Criqui requested that Section 7 (Results and Conclusions) of the SSP Report include figures depicting areas of concern ("hot spots"). Mr. Hoff indicated that this would be done. More specific information regarding the proposed additional investigation activities will be added.

All parties then agreed that SSA 1 would proceed to RI/FS, with additional soil sampling (for CPAHs) and a habitat evaluation of the drainage ditch. Mr. Stryker indicated that funding for this would be available in the FY 1997 budget.

Mr. Hoff discussed results of the SSP at SSA 6. Results of the SSP indicate that the only area of concern at SSA 6 is near the helo-pad. PCBs were detected in subsurface samples collected from test pits in this area. This area of SSA 6 will be nominated as an IR site for additional RI activities in the Final SSP Report. Additionally, low levels of explosives were detected in groundwater. Mr. Thomson indicated that the groundwater problem might be associated with Sites 6 and 7. Mr. Hoff indicated that the Final SSP will include maps that show the proximity of these sites to SSA 6.

Mr. Hoff indicated that the Final SSP Report would serve as the basis for the work plan. Mr. Criqui asked Mr. Thomson if he was comfortable going to Final on this report. Mr. Thomson indicated that he was, but that he would have to coordinate with BTAG.

Mr. Stryker noted that a comment response to a VADEQ comment brought about a subsequent comment by the USEPA on the subject of nitrate/nitrite as degradation products of nitramines/nitroaromatics. Mr. Hoff noted that his response to the comment was too brief and implied that nitrate/nitrite were not products of degradation of nitramines/nitroaromatics. The response should have read that it has been observed that no relationship between nitrate/nitrite and nitramines/nitroaromatics has been observed in the Round Two RI data generated to date. Because of VADEQ concerns, soil and groundwater samples will be analyzed for nitrate/nitrite, TKN and ammonia in addition to TDS, TSS (in groundwaters). This will affect the Work Plan for Sites 1 and 3 which will be submitted as a Final within the next few weeks.

Mr. Harlow discussed agenda items for meetings at WPNSTA on January 10 and 11.

Mr. Criqui discussed VADEQ comments on the Sites 1 and 3 Work Plan. Mr. Criqui recommended inclusion of the following sample parameters: TKN, ammonia, nitrate/nitrite and TDS.

The conference call ended at approximately 10:30 a.m.