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NWS YORKTOWN
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COMMENTS ON REVISED PROPOSED PLAN AND REMEDIAL INVESTIGATION SITES 1
AND 3 NWS YORKTOWN VA
3/4/1998
U S EPA REGION III

3/4/98-01398



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
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Date: March 4, 1998

Mr. Scott Park
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.
Sites 1 and 3
Review of the Navy's *RI/BRA* Report

Dear Mr. Park:

In light of the recent Partnering initiative which supported the development of a *revised Proposed Plan* for Sites 1 and 3 that is acceptable to all the Parties involved with the cleanup of the Naval Weapons Station-Yorktown (WPNSTA), the U.S. Environmental Protection Agency (EPA) has reviewed the Navy's *Remedial Investigation/Baseline Risk Assessment (RI/BRA)* for Sites 1 and 3, dated July 1997, to insure that the language contained therein supports the concepts contained in the revised *Proposed Plan*. Based upon our review, we have the following comments to offer:

1. Page ES-24, Bottom Paragraph

A determination of whether or not the deep aquifer at Sites 1 and 3 meet the Class III aquifer definition(s) has not been adequately presented nor is supported by the information contained in the *RI/BRA*. Please remove reference to the deep aquifer in this paragraph.

2. Page ES-24, Bottom Paragraph

Please include the following information in the bottom paragraph.

Concentrations of volatile organics and inorganics detected in the deep aquifer at Sites 1 and 3 exceeded federal MCLs. Further groundwater characterization is needed at Sites 1 and 3.

ADMINISTRATIVE RECORD FILE

3. Page ES-25, 1st bullet

Please modify the first bullet to state that:

Concentrations of volatile organics and inorganics detected in the deep aquifer at Sites 1 and 3 exceeded federal MCLs. Further groundwater characterization is needed at Sites 1 and 3.

4. Page ES-25, 2nd Bullet

Sites 1 and 3 will require institutional controls and long-term groundwater monitoring (waste left in-place). Please modify the last (2nd) bullet to reflect this (not a no further action). Also, as a result of Partnering, it was EPA's impression that soil covers were being placed or re-graded at Sites 1 and 3 to comply with state ARARs for closure of solid waste landfills. If this is the case, please include discussion here.

5. Section 7, Figures

There are now a total of 5 figures in Section 7, but they are labeled incorrectly, i.e. 7-1, 7-2, 7-1, 7-2, and 7-3. Please correct.

6. Page 8-3, Deep Groundwater

Please include discussion on whether or not contaminant concentrations in the deep aquifer(s) exceeded Federal MCLs at Site 1.

7. Page 8-5, Groundwater

Please include discussion on whether or not contaminant concentrations in the deep aquifer(s) exceeded Federal MCLs at Site 3.

8. Page 8-7, Bottom of Page, 1st Bullet

Please modify the first bullet to state that:

Concentrations of volatile organics and inorganics detected in the deep aquifer at Sites 1 and 3 exceeded federal MCLs. Further groundwater characterization is needed at Sites 1 and 3.

9. Page 8-8, 2nd Bullet

Sites 1 and 3 will require institutional controls and long-term groundwater monitoring (waste left in-place). Please modify the 2nd bullet to reflect this (not a no further action). Also, as a result of Partnering, it was EPA's impression that soil covers were being placed or re-graded at Sites 1 and 3 to comply with state ARARs for closure of solid waste landfills. If this is the case, please include discussion here.

This concludes EPA's review of the July 1997 version of Navy's *Remedial Investigation/Baseline Risk Assessment* for Sites 1 and 3. The above noted discrepancies in the *RI/BRA* need to be addressed to insure that all Parties will concur with the Navy's revised *Proposed Plan* for Sites 1 and 3 located at the WPNSTA. If you have any questions regarding the above, please feel free to call me at (215) 566-3357,

Sincerely,



Robert Thomson, PE
Federal Facilities (3HS50)

cc: Steve Mihalko (VDEQ, Richmond)
Jeff Harlow (WPNSTA, 09E)
Dawn Ioven (USEPA, 3HS42)
Bruce Rundell (USEPA, 3HS42)