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COMMENTS ON REVISED PROPOSED PLAN FOR SITES 1 AND 3 NWS YORKTOWN VA
4/30/1998
U S EPA REGION III

4/30/98-01400



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
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Date: April 30, 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 & 3
Review of the Navy's draft revised *Proposed Plan*

Dear Mr. Park:

The U.S. Environmental Protection Agency (EPA) has reviewed the Navy's draft revised *Proposed Plan*, dated April, 1998, for Sites 1 and 3 located at the Naval Weapons Station-Yorktown (WPNSTA). Based upon our review, we offer the following comments:

1. Page 17, Scope and Role of Action

The paragraph states that "...No other remedial actions are taken place at either of the sites, or any additional actions anticipated...". The phrase *are taken place* does not make grammatical sense. It would be better to state that no other remedial actions are planned. However, the true meaning of this phrase is contradicted later in the draft revised *Proposed Plan*. On page 21, top of the page, where discussion of Site 1 RAA 3 is outlined, the paragraph continues "...Since contaminants will be removed and disposed of under this RAA, a five year review of this RAA will be required..." The logic of this statement is not clear, but the requirement to conduct a five year review is contrary to the statement made on page 17.

Additionally, on page 21, top paragraph, the statement is made that "...In addition, institutional controls will be implemented, since contaminants are not being removed to residential (risk) levels..." This contradicts the statement made on page 17 under Scope and Role that "...No other remedial actions are taken place at either of the sites, or any additional actions anticipated..."

On page 23, where discussion of Site 3 RAA 4 is located, there is a statement that "...*In addition, institutional controls will be implemented...*". Again, this contradicts that statement made on page 17 under Scope and Role.

2. Page 21, Site 1, RAA 3

The discussion of Site 1 RAA 3 states that "...*Since contaminants will be removed and disposed of under this RAA, a five year review of this RAA will be required...*" The logic of this statement is not clear. Whether or not contaminants are removed from the site is immaterial to triggering the requirement for a five year review. Waste material can be removed from a site, but the remaining soil or waste could contain contaminants above residential risk levels, necessitating the need for a five year review. Hence, it would be better to state that waste or soil would be removed from a site such that the remaining soil would not present a residential health risk, if such where the case.

3. Page 22, Site 3, RAA 3

The discussion of Site 3 RAA 3 states that "...*Since contaminants will be removed from Site 3 and treated under this RAA, a five year review of this RAA will be required...*" The logic of this statement is not clear. Whether or not contaminants are removed from the site is immaterial to triggering the requirement for a five year review. Waste material can be removed from a site, but the remaining soil or waste could contain contaminants above residential risk levels, necessitating the need for a five year review. Hence, it would be better to state that waste or soil would be removed from a site such that the remaining soil would not present a residential health risk, if such where the case.

4. Page 23, Site 3, RAA 4

In the discussion of Site 3 RAA 4, there is the statement that "...*In addition, institutional controls will be implemented...*". This contradicts that statement made on page 17 under Scope and Role that "...*No other remedial actions are taken place at either of the sites, or any additional actions anticipated.*"

This concludes EPA's review of the Navy's draft 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
Superfund Federal Facilities (3HS50)