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LETTER AND RESPONSES TO REGULATOR COMMENTS ON DRAFT FEASIBILITY STUDY  
FOR GROUNDWATER SITE 3 NWS YORKTOWN VA

09/10/2013  
CH2M HILL



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September 10, 2013

Mr. Wade M. Smith  
VDEQ – Office of Remedial Programs  
VA Dept of Environmental Quality  
629 East Main Street  
Richmond, VA 23219

Subject: Response to Comments on the Draft Feasibility Study for Groundwater at Site 3, NWS Yorktown, Yorktown, Virginia

Dear Mr. Smith,

This letter is in response to the Virginia Department of Environmental Quality's (VDEQ's) comments following their review of the Draft Feasibility Study Report for Groundwater at Site 3, Naval Weapons Station Yorktown, Yorktown, Virginia (March 2012). The comment letter was dated July 9, 2013. Comments are presented below followed by responses in italics.

#### **Section 4.2.1 Pre-Design Investigation**

1. Comment: Please consider revising the table in section 4.2.1 to indicate the existing monitoring wells vs. the new monitoring wells and the interior monitoring wells vs. the upgradient monitoring wells.

*Response: The table will be revised as requested.*

#### **Chemical Specific ARARs**

2. Comment: Virginia's Groundwater Quality Standards (9 VAC 25-280-30). DEQ requests that this regulation be listed as a chemical specific ARAR, as it establishes Virginia's antidegradation policy to support groundwater quality standards to protect public health or welfare and enhance the quality of water.

*Response: The requested ARAR has been added to the table only as it applies to the identified COCs at the site.*

#### **Action Specific ARARs**

3. Comment: DEQ notes that 9 VAC 20-60-262 is listed as an ARAR as it incorporates 40 CFR 262.34.(a)(1)(i),(2),(3). Please add (4) to the relevant sections.

*Response: As noted in an August 15, 2013 email from the VDEQ, Provision (a)(4) will not be added to the list of ARARs since it does not include any substantive requirements.*

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4. Comment: DEQ notes that 9 VAC 20-81-95 (D)(10)(b) is listed as an ARAR. Please add 45 (B)(2)(f) to the relevant sections.

5.

*Response: Since 9 VAC 20-81-45(B)(2)(f) does not contain any substantive requirements, it was not added to the table.*

6. Comment: Please note that the State ARARs have been identified as preliminary ARARs based on the information contained in the Feasibility Study Report for Groundwater at Site 3. DEQ reserves the right to make final ARARs recommendations that will be identified in the Record of Decision (ROD).

*Response: Comment noted.*

Please provide acceptance of these responses. Any back comments are requested by October 10, 2013. Should you have any additional questions, please feel free to contact me.

Sincerely,

CH2M HILL



William J. Friedmann, Jr.

Activity Manager

cc: Mr. Wade Smith/VDEQ  
Mr. James Gravette/NAVFAC Midlant  
Ms. Mary Anderson/CH2M HILL