

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

SUBJECT: Naval Weapons Station-Yorktown DATE: 3-7-94  
Master Site Work Plans  
RI Work Plans for Sites 6, 7, 12, & 16  
Response to BTAG review comments

FROM: Robert Thomson *RGT*  
VA/WV Superfund Federal Facilities (3HW71)

TO: Bob Davis, BTAG Coordinator  
Superfund Technical Support (3HW13)

Bob:

In response to the BTAG review comments the Navy received during our meeting of February 22 concerning the draft Master Site Work Plans and the draft Site-Specific RI Work Plan for Sites 6, 7, 12, and 16 at the Naval Weapons Station-Yorktown, the Navy has agreed to make the following changes to the above draft Plans as outlined below:

The Navy will increase the level of effort of sampling in and around those specific reaches of Felgates and Ballard Creeks that receive either surface water or groundwater discharges directly from identified source areas, i.e. sites 6, 7, 12, and 16. This intensive sampling effort within these specific reaches will include sediment, surface water and benthic macroinvertebrate sampling, as well as surveying fish populations.

The Navy does not concur with the BTAG recommendation to conduct a study of the entire stretch of Felgates Creek at this time. There are numerous identified source areas (8 so far) located along the tributaries feeding into Felgates, each having very similar contaminants, i.e. explosives. Thus, the identification of the source of any explosive contamination found in Felgates Creek would be difficult given the multiple source scenario present. However, the Navy has agreed to conduct the intensive source-specific reach study as mentioned above. The Navy considers this source-specific reach approach to be the first of a phased plan to conduct an ecological assessment of Felgates Creek.

If contamination is found within a source-specific reach of Felgates Creek, or if environmental stress is detected within such a reach, the Navy will either expand the investigation of Felgates Creek under the auspices of the source area Operable

Unit, or it will create a new Operable Unit to investigate the whole of Felgates Creek, depending on the specific circumstances. The Navy believes this phased approach will allow for expanded sampling if possible adverse effects on aquatic populations and communities is detected. Previous surface water samples taken from various locations throughout the Weapons Station revealed low level contamination along specific sections of the Felgates and Ballard Creeks, usually near known source areas, as well as moderate contamination found in Lee Pond. Based upon the concentrations detected in surface water, contaminants associated with the Weapons Station's activities do not appear to pose an imminent threat to the environment.

Additionally, once all the identified sources along Felgates Creek have been remediated and an investigation of the whole stretch of Felgates has not been accomplished, the Navy, EPA and the State will meet to determine if data exists to warrant investigating the whole of Felgates Creek as an Operable Unit.

Also, for the other creeks, tributaries and ponds present at the Naval Weapons Station other than Felgates Creek, i.e. Ballard Creek, Roosevelt Pond, Lee Pond, Pond 10, Pond 11, Pond 12, and King Creek, where the multiple-source/common contaminant scenario does not appear to apply, the Navy agrees to pursue ecological assessments at such areas on a watershed approach, i.e. investigating the entire stretch of such surface water bodies, given specific circumstances warrant such an investigation.

However, some of the BTAG comments request the performance of all ecological studies under the auspice of one Operable Unit. Given that the Navy is operating under a constrained budget for environmental clean-up, the requirement to perform such "whole stretch" investigations to coincide with the investigation of identified source areas may not be an available option. For example, the investigation of Site 12, a source area, has already been budgeted by the Navy and will proceed, while the Navy establishes an Operable Unit, develops Work Plans, and, more importantly, obtains the needed funding to investigate the whole of Ballard Creek in the immediate future. Thus, the Navy is committed to perform such an undertaking, while prioritizing the investigation and remediation of identified sources with available funding first. This procedure has the concurrence of the EPA RPM.

This concludes the Navy's draft response to BTAG oral comments presented during the February 22 meeting in Philadelphia. After reviewing the above, please respond to me in writing on whether you concur or not on the Navy's proposal for the development of Work Plans at the Naval Weapons Station-Yorktown. Additionally, if you have any written BTAG comments, please forward them to me by **March 14, 1994**.

THANKS FOR YOUR TIME AND CONSIDERATION, Rob Thomson