

3/14/2008 - 02319



COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 1105, Richmond, Virginia 23218
Fax (804) 698-4500 TDD (804) 698-4021
www.deq.virginia.gov

David K. Paylor
Director
(804) 698-4000
1-800-592-5482

March 14, 2008

Linda Cole, P.E.
NAVFAC Mid-Atlantic, Building N-26, Room 3208
Hampton Roads Restoration Product Line, Code OPHREV4
9742 Maryland Avenue
Norfolk, VA 23511-3095

**RE: Revised Draft Explanation of Significant Differences
Site 17 – Holm Road Landfill
Naval Weapons Station Yorktown
Yorktown, Virginia**

Dear Ms. Cole:

The Virginia Department of Environmental Quality (DEQ) has received the *Revised Draft Explanation of Significant Differences, Site 17 – Holm Road Landfill* (ESD) for Naval Weapons Station Yorktown, Yorktown, Virginia. The November 7, 2007 ESD, prepared by CH2M HILL, was received by the DEQ (electronically) on November 8, 2007.

Thank you for providing the DEQ's Office of Remediation Programs the opportunity to review the above-referenced ESD. It is this office's understanding that the November 7, 2007 ESD supersedes the August 10, 2006 ESD associated with Site 17. DEQ comments on the August 10, 2006 ESD were submitted by Mr. Eric Salopek on November 6, 2006. Although no "official" responses to comments were received, consequent discussions and the May 2007 test pit investigation were conducted to determine the presence or absence of waste in the area of previously identified geophysical anomalies at Site 17. Subsequent to DEQ's internal review of the November 7, 2007 ESD, this office has the following comments:

SECTION 2.2

Please include a summary of the 1992 geophysical summary that identified anomalies and reference in Section 8.0.

Please include a summary of the 1996 Baker Test Pit investigation and reference in Section 8.0.

Please change to: A copy of the June 22, 2007 Technical Memorandum, originally submitted in the November 2007 Final Five-Year Review Report, is included as Attachment 2 to this document.

SECTIONS 2.2, 2.3, and 8.0

Please clarify: "The Round Two RI was completed in 1997 (Baker, 1997)." (Section 2.2) and "...the Round Two RI (Baker, 1997)..." (Section 2.3) and "Baker. 1997. Final Round Two Remedial Investigation Report for Sites 11 and 17, Naval Weapons Station Yorktown, Yorktown, Virginia. September 1997." (Section 8.0) versus "Baker. 1998. Final Round Two Remedial Investigation for Sites 11 and 17, Naval Weapons Station Yorktown, Yorktown, Virginia. August 1998." (Section 8.0).

SECTION 2.3

Please change to: Site non-carcinogenic ~~risk~~ risks are evaluated by...

SECTION 2.4

Please indicate the approximate width and length of excavation that was identified in the September 27, 2000 Record of Decision.

Please contact me at (804) 698-4125 or wmsmith@deq.virginia.gov with any additional questions.

Sincerely,



Wade M. Smith
Remediation Project Manager
Office of Remediation Programs

cc: Robert Thomson, EPA