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July 21, 1994

U.S Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, Pennsylvania 19107

Attn: Mr. Robert Thomson, P.E.
Remedial Project Manager (3HW71)

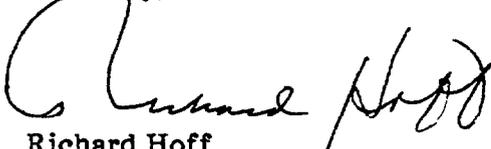
Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0229
Site Screening Process Guidelines
Naval Weapons Station Yorktown, Yorktown, Virginia

Dear Mr. Thomson:

Baker Environmental and the Navy are pleased to provide a copy of the responses to comments to the Draft Site Screening Process Guidelines for Naval Weapons Station Yorktown, Yorktown, Virginia for your review and comment. This report, dated April 14, 1994, will be finalized subsequent to your acceptance of these responses.

If you have any further comments or questions concerning the document or responses, please contact me as soon as possible at (412) 269-2099.

Sincerely,



Richard Hoff
WPNSTA Activity Coordinator

cc: Mrs. Brenda Norton, LANTDIV - Engineer in Charge
Ms. Lisa Ellis, VDEQ
Ms. Jennifer Loftin, WPNSTA



A Total Quality Corporation

Response to Comments
Draft Site Screening Process Guidelines
Naval Weapons Station Yorktown, Yorktown, Virginia

U.S. Environmental Protection Agency
Robert Thomson, P.E., Remedial Project Manager

Letter dated May 9, 1994

1. Section 2.0, page 1; Text addressing efforts to obtain available historical photographs and aerial photographs has been added to the text.
2. Section 3.0, page 2, second paragraph; Reference to the collection of filtered and unfiltered groundwater samples has been added to the text.
3. Section 5.1, page 3; Agreed. COPCs will be selected using the USEPA Region III guidance document entitled "Selection of Contaminants of Concern by Risk-Based Screening (January, 1993)" (SCCRBS). This section has been modified accordingly. Furthermore, a distinction between human health COPC and ecological COPC selection was also included for consistency with USEPA ecological risk assessment practices.
4. Section 5.1, page 3; The frequency of detection criteria for the selection of COPCs is discussed in the SCCRBS guidance document. However, text has been modified to include other criteria presented in USEPA's comment which supplement the frequency of detection criterion. Section 5.1 text now contains the statement:

Chemicals may be eliminated from consideration as COPCs if: their frequency of detection is less than five percent; they are not site related; they are not considered to be degradation products of site related contaminants; and they are not present as a hot spot. The potential environmental mobility will also be considered as part of the selection process.

These criteria, in conjunction with a comparison to SCCRBS risk based concentration (RBC) values will be used to select COPCs at all SSAs.

5. Section 5.1, page 3; Agreed. Facility-specific background information will be available for determining background risks, to which, risks associated with SSAs can be compared. However, Section 5.1 text has been modified to eliminate a comparison to background as part of the selection criteria in the SSP.
6. Section 5.1, page 3; Agreed. Both filtered and unfiltered metals analyses will be performed; however, analytical data from the filtered sample only will be used to select COPCs due to the anticipated high suspended solids in the HydroPunch[®] sampling methodology. No text changes are required.

7. Section 5.2, page 4; Agreed. An additive risk characterization is part of the SSP and is discussed in Section 5.4 of this document. No text changes are required.
8. Section 5.2, page 4, fourth paragraph; References to the Focused Biological Sampling and Preliminary Risk Evaluation have been removed from this section.

Surface water and sediment data will be used to evaluate whether there is a potential for fish to bioaccumulate contaminants and potentially cause human health effects. An exceedance of State or Federal surface water standards or criteria will initiate a review of biological concentration factors (BCFs). If BCFs suggest the potential for bioconcentration in fish tissue an estimate of potential fish tissue concentrations will be derived using the BCF and the maximum detected water-borne contaminant concentration. Text has been modified to reflect this change.

9. Section 5.2, page 4, fourth paragraph; Additional risk-based concentrations will not be derived for the dermal exposure pathway as part of the SSP. However, the lack of a dermal component in USEPA Region III RBC values will be addressed quantitatively in the uncertainties section of the SSP. Evaluating dermal intake as part of the uncertainties section will provide a better discussion of the many variables associated with this pathway. Steady and nonsteady state dermal permeability, soil absorption and absorbed dose toxicological indices as described in EPA's Dermal Guidance (1/1992) will be evaluated to determine the conservatism of the risk estimates derived as part of the SSP. If the dermal pathway proves to be a significant contributor to human health risk associated with an SSA (i.e. ICR increases by an order of magnitude or HI exceeds 1.0 as a result of the dermal component), the findings of the uncertainty section will be reflected in the Decision Document. Text has been modified accordingly.
10. Section 5.5, page 7; The document entitled, "Use of Monte Carlo Simulation in Risk Assessment" (February 1994) has been included as an appendix in the Draft Final Site Screening Process Guidelines.
11. Section 6.0, page 7; The USEPA Region III comments 1 through 10 have been incorporated in appropriate sections. Further text changes to Section 6.0 are not necessary.

To the extent possible, the Decision Document will contain a detailed compilation of site history, maps and aerial photographs. This has been specified in Section 6.0 text.

12. Section 7.0, page 8; The USEPA Region III comments 1 through 10 have been incorporated in appropriate sections. Further text changes to Section 7.0 are not necessary.