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U S EPA REGION III RESPONSE TO U S NAVY COMMENTS TO DRAFT SITE INSPECTION
REPORT SITES 4 AND 9 AREA OF CONCERN 3 (AOC3) NWS YORKTOWN CHEATHAM
ANNEX WILLIAMSBURG VA
7/25/2011
U S EPA REGION III



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

July 25, 2011

Ms. Krista Parra
NAVFAC MIDLANT, Building N-26
Hampton Roads Restoration Product Line, Code OPHREV4
9742 Maryland Avenue
Norfolk, VA 23511-3095

Subject: Response to Comments, Draft Site Inspection Report, Site 4, Site 9, and Area of Concern 3; Naval Weapons Station Yorktown Cheatham Annex, Williamsburg, Virginia; June 2011

Ms. Parra:

Thank you for the opportunity to review the subject document. EPA would like to provide the following comments at this time.

Comment 5 Response: This response is not adequate. The concern is that by omitting the nitric acid rinse cross-contamination among samples can occur. The response needs to be more focused on this issue and not that the partnering team thought this was acceptable.

Comment 7 Response: BTAG does not agree with solely using the mean chemical concentrations for assessing risk to ecological receptors with limited or no mobility (e.g., invertebrates and plants). Therefore, the maximum chemical concentrations must still be considered in the "refined analysis" for soil/sediment invertebrates and plants.

Comment 8 Response: It still needs to be clarified if all chemicals with a maximum concentration HQs equal to or exceeding 1.0 are retained as COPCs.

Comment 9 Response: The author states "The list of chemicals to be evaluated during the RI will be included in an RI-UFP-SAP, to be submitted under a separate cover." The RI-UFP-SAP will need to clearly and adequately support the selection of the chemicals to be included in this report.

Comment 11 and 16 Responses: The responses needs to show what "semi-quantitative risk evaluation" was used to determine that a chemical concentration that exceeded

background and the screening value showed an acceptable ecological risk and that no further ecological risk evaluation was needed.

Comment 12 Response: This response is not adequate. If the potential for ecological risk exists in these downgradient habitats (Youth Pond and the York River), it is not clear why these additional habitats are not included in this document. If the decision is still to not address Youth Pond and the York River in this document, then the Navy needs to clearly document how they will address the potential for ecological risk in these additional habitats.

Comment 14 Response: The response indicates that pesticides were not known to have been disposed of at Site 9. This suggests that all pesticide disposal activities are recorded and this information is retained in an accessible file. The uncertainty associated with this assumption needs to be adequately discussed.

Comment 15 Response: This response indicates it is premature to connect PCB contamination in Youth Pond to Site 9. Because Youth Pond is downstream of Site 9 it is not clear why it is not appropriate to make this connection. Again, the Navy must address how Youth Pond and the York River are going to be addressed.

If you have any questions, please contact me at 215-814-3378.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Burchette", written in a cursive style.

John Burchette
Remedial Project Manager

cc: Wade Smith, VDEQ