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LETTER REGARDING THE ATTACHED COMMENTS ON THE DRAFT SITE SCREENING
PROCESS REPORT FOR SIE SCREENING AREAS 2, 17, 18 AND 19 NWS YORKTOWN VA
10/18/1995
COMMONWEALTH OF VIRGINIA



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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Peter W. Schmidt
Director

P. O. Box 10009
Richmond, Virginia 23240-0009
(804) 762-4000

October 18, 1995

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
ATTN: CODE 1822, Gregory P. Hatchett
Norfolk, VA 23511-2699

Re: Draft Site Screening Process Report for Site Screening
Areas 2, 17, 18 and 19, Naval Weapons Station Yorktown,
Yorktown Virginia.

Dear Mr. Hatchett:

Thank you for providing the Department of Environmental
Quality, Federal Facilities Section the opportunity to comment on
the above referenced Site Screening Process Report. Attached are
our comments on the report.

If you have any questions, please feel free to contact me at
(804) 762-4202.

Sincerely,

A handwritten signature in blue ink that reads "Stephen Mihalko".

Stephen Mihalko
Remedial Project Engineer

cc: Rob Thomson, EPA Region III
Jeff Harlow, NWS Yorktown
Erica Dameron

**VDEQ comments on the Draft Site Screening Process Report
for Site Screening Areas 2, 17, 18 and 19, Naval Weapons
Station Yorktown, Yorktown Virginia.**

1. Page ES-4 and the Summary and Conclusion Section mentions 3 drums were found on the perimeter of the ponds in SSA 19. The specific location of the drums should be shown on the maps with reference to sampling locations. If sampling was not performed at the location where the drums were found then further investigation should be conducted.
2. Debris and possibly ordinance fuses and/or detonating devices were noticed south of the ten foot clearing in SSA 2 during a recent site visit. Figure 3-1, shows most of the sampling was done north of the clearing. It appears as though the area south of the clearing was also used as a disposal area and more samples should be taken in this area.

Ecological Risk Assessment (ERA)

3. Site 19 was the only site considered for an ecological evaluation, and that only included surface water and sediment from the three ponds located near this site. An explanation should be provided regarding the exclusion of Areas 2, 17, and 18 from the ERA, and the exclusion of a terrestrial screen at Area 19.
4. When available for a given medium, EPA Region III BTAG screening level values should be used in the derivation of the EQs. When not available, secondary screening level values should be utilized.
5. Page 6-8 (2nd paragraph) - "Of the inorganics detected, four analytes ..." Four should be changed to five.
6. On the top of page 6-33, there is a discussion about the interpretation of Ecological Index (EI) values for surface water and sediment. For screening purposes, the Ecological Quotients (EQ) should be compared with unity in accordance with EPA Region III's Interim Guidance. Also, applying a factor of 10 for those compounds with high BCFs appears to be an appropriate method to prevent adverse risk to potential receptors. Please provide the literature source/guidance document which recommends use of the application factor?
7. It would be helpful to have a table which includes the Ecological Quotient (EQ) and the values used in the derivation of the EQs, for each Contaminant of Potential Concern (COPC). Some information has already been included such as concentration range, minimum/maximum values, number of samples/detects. Additional information should include data mean and the 95% UCL. This information is necessary as my EQ calculations do not match with those listed in the text of the report.

8. Adjacent to Area 19 (or on the site?) there is a bald eagle nest. Since an isomer of chlordane was detected in Pond 11A, there is concern regarding possible risk to this federally endangered species. For this reason, it is advised that additional work be conducted at this site to ensure the local eagle population is not at risk from on-site contaminants (collection of fish tissue would be beneficial in this evaluation).
9. Table 6-13: Inorganics (Total) - chromium is listed incorrectly as hexavalent chromium whereas in the dissolved section, chromium is listed as "chromium" which is interpreted as total chromium. Please change these since hexavalent chromium is sampled in accordance with the dissolved methodology for metals (i.e., filtered through a 0.45 um filter).

Summary and Conclusions:

10. We feel that further cleanup action and monitoring may be necessary at this site. Based on the recent site visit it appears that there are debris and possibly ordinance fuses and/or primers on the surface at the site.
11. We agree with the recommendation that SSA 17 appears to need no further action with respect to the Waste Otto Fuel UST. However, there is no information concerning the other USTs at the site. Please include any sampling data which would verify the integrity of the tanks and/or removal.
12. We agree with the conclusion that SSA 18 requires additional investigation, which we recommend to be conducted as a formal Remedial Investigation.
14. SSA 19 is a large area and only 6 sample points were located near the fringe of the site in order to provide data. Additional sampling should be conducted in the middle of the site where the disposal activities had occurred before this site is recommended for no further action.