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COMMENTS ON FINAL FEASIBILITY STUDY FOR SITES 6 AND 7 NWS YORKTOWN VA
6/11/1998
NOAA

6/11/98 -01404

June 11, 1998

Ms. Barbara Okorn (3HS41)
BTAG Coordinator
EPA - Region III
841 Chestnut Street
Philadelphia, PA 19107

RE: NWS Yorktown

Dear Ms. Okorn:

Thank you for the opportunity to provide comments on the May 28, 1998 Final v.2 Feasibility Study, Sites 6 & 7 at the Naval Weapons Station Yorktown, Yorktown, Virginia. The following comments are made on behalf of the National Oceanic and Atmospheric Administration (NOAA).

I have not been able to confirm that NOAAs previous comments, May 20, 1998, on version 1 of the FS have been adequately addressed. Version 2 of the FS, should clearly indicate where and how these comments were addressed.

Page ES-5: In the identification of areas of concern there are assumed excavation depths of 5 feet, 1 foot, and .5 feet associated with SAOCs #1, #2, and #3 respectively. The 5 feet of excavation is the only one that is supported by data (see page 2-17 section 2.7.1.5 - second paragraph). There should be some rationale stated for supporting the other two excavation depths, other than "assumed." This same comment applies to section 3.5 on page 3-12 and page 5-7, section 5.1.5 (RAA5) and possibly other places in the FS.

Page ES-9: Under the RAA3 alternative the statement is made that "The surface soil in the Excavated Area...is contaminated with zinc...." However, on page ES-6 there is reference to this same area being contaminated with Cd and Zn. These two statements (and the rest of the document?) should be consistent.

Page ES-10: The statement is made that Ni and Zn will not be reduced by treatment in the biocell as will the VOCs and explosives. Yet, "The treated soil and sediment will be used to backfill the disturbed area at SAOC#3." This section should clearly indicate why this soil/sediment mixture contaminated with Ni and Zn will be used as backfill material on another contaminated portion of this remedy. This clarification should also be included in the body of this FS.

Page ES-13: There are two statements made which appear to be redundant and one should be removed. The two statements are (1) "All of the RAAs will require five year reviews since COCs above the RLs will remain on site (SAOC#2); and (2) "All of the RAAs will require five year reviews since COCs above the RLs will remain on site (SAOC#2 and #3)."

Page ES-13: The statement is made that "RAA 6 includes removal of nickel-contaminated sediment...." However, on page ES-10, there is reference to the use of Ni and Zn contaminated soil and sediment being used as backfill. If these two statements are referring to the same media, then the contaminants listed should also be the same. This section is also not clear on how the excavation/treatment of soil and sediment, which will not affect concentrations of Ni and Zn and the use of this same material as backfill constitutes "Reduction of Toxicity, Mobility , or Volume Through Treatment" as denoted by the heading of this section.

Page 2-12, section 2.6.9 (Field Scale Pilot Study at Site 7): The conclusion is made that "At the completion of this pilot study, Site 7 was considered to have been remediated." This conclusion should also appear in the executive summary section.

Page 2-12, section 2.6.10 (Ecological Toxicity Study for Site 6): The conclusion of this study should be presented in this section.

Page 2.7 (Nature and Extent of Contamination): The statements are made that "The reason for this is that the inorganic contaminants, while contributing to site risk in some instance, are not primary contributors to site risk. In addition, levels of inorganic contamination detected in the various site media generally were not significantly higher than station background levels." If these are the reasons that the soil/sediment that the biocell treatment will not reduce concentrations of Ni and Zn will be used as backfill material, then this should be stated in this section and the ES.

Page 2-19, section 2.7.2.5 (Site 7 - Sediment): The statement is made "The tributary to Felgates Creek does not appear to be impacted by nitramine contamination." The use of the phrase "does not appear" is not as conclusive as no nitramine compounds were detected in the tributary to Felgates Creek (see page 2-17, section 2.7.1.5 (Site 6 - Sediment). This should mean that Site 7 will be part of the long-term monitoring program. This should be made clear in this document.

Page 2-26, section 2.9.1.1 (Aquatic Ecosystem): This section indicates that Hg is one of the contaminants in surface water and sediment that indicated risk to ecological receptors. Hg is also one of the contaminants that is important from a bioaccumulation perspective. These facts appear to be in conflict with the previous statement in the ES section that inorganics are not risk drivers at Sites 6 and 7. This inconsistency should be more clearly explained.

Page 2-32, section 2.10.2 (Ecological Risk Assessment): The phrase "...a topic of formal...partnering activities" is used and the use of the word "formal" is not clear. This word should be deleted.

Page 3-3, section 3.1.2 (Site 7): The statement is made that "These COCs will not be retained for further evaluation in this FS report." The antecedent ("The remaining inorganics..." or "Inorganic constituents...") of "These COCs..." is not clearly indicated.

Page 3-4, section 3.1.3 (Felgates Creek): Two contaminant concentration qualifiers (K and L) are used in this section. These qualifiers should be defined. Also, in this same section, the statement is made that "Because selenium concentrations in Felgates Creek sediment are similar to background, this constituent would not be retained as a COC for further evaluation in the FS." The verb "would" should be changed to "will".

Page 5-3, section 5.1.3 (RAA3): The statement is made that the "...six sample locations contaminated with concentrations above RLs...will be monitored by collecting six sediment samples annually and analyzing the samples for VOCs, SVOCs, and explosives." Since the long-term monitoring plan has not been completed, this statement may be prematurely limiting. Therefore, this statement should be changed to say that these areas would be monitored according to the long-term monitoring plan that will be developed as part of the remedial design.

Page 5-9, section 5.1.6 (RAA6): This section refers to the use of a "...staging area..." for the treatment process of the soil/sediment that is located west of building 109. The environmental impacts to the habitat in this area should be described and any mitigation needed addressed in this FS or RD document.

Table 6-1 (Preliminary RAA Ranking, Site 6): Since all of section 6 was not available for review, I am not certain if this table is adequately discussed in the text. In particular, one of the rows in this table is identified as "Compliance

with ARARs." The ranking value given for all of the RAAs is one. The text should clearly indicate why this ranking is the same for all of the RAAs.

If you have any questions, please contact me at (215) 566-3321.

Sincerely,

Peter T. Knight
NOAA - Coastal Resource Coordinator