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COMMENTS ON FINAL PROPOSED REMEDIAL ACTION PLAN FOR SITE 1 AND SITE 3
NWS YORKTOWN VA
6/19/1998
NOAA

6/19/98-01407

June 19, 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 1998 Final v2 Proposed Remedial Action Plan for Site 1 - Dudley Road Landfill and Site 3 - Group 16 Magazines Landfill at the Naval Weapons Station Yorktown, Yorktown, Virginia. The following comments are made on behalf of the National Oceanic and Atmospheric Administration (NOAA).

The preferred remedy described in the PRAP for Site 1 is soil cover, surface debris removal, and excavation with off-site disposal and that for Site 3 is soil excavation with off-site disposal and debris removal. The selected remedies for Sites 1 and 3 are the most protective of the listed alternatives and should help to reduce or eliminate any transport of contamination from the sites.

Page 15, Ecological Risk Assessment: The information contained in this section only addresses the terrestrial ecosystem at sites 1 and 3. Both of these sites are located near Indian Field Creek and are also separated by a tributary to Indian Field Creek. Both surface water and groundwater discharge to Indian Field Creek. Therefore, the ecological risk assessment should include the aquatic ecosystem too. This section should be expanded to include this additional information.

Page 21, Site 1, RAA3: The statement is made that "In addition,...a five year will be required, since contaminants are not being removed to residential levels." This statement should more clearly indicate that during this five year "review," monitoring of the terrestrial and aquatic environments will occur.

Page 21, Site 1, RAA3: There is a reference to "...A minimum of 10 confirmatory soil samples...." This section should clearly indicate that these samples will not be composite samples.

Page 21, Site 1, RAA3: There is a reference to the removal of "...approximately 105 cubic yards of arsenic-contaminated soil..." The statement is also made that "An estimated 3,200 cubic yards of soil fill and 800 cubic yards of topsoil will be necessary to fill the excavation and restore the surface of Site 1." There appears to be an inconsistency between the amount of material excavated and needed for backfill. This section should clearly explain the need for an additional 3,895 cubic yards of fill material.

Page 23, Site 3, RAA4: The description of this activity includes a statement that "An estimated 90 cubic yards of PAH-contaminated soil will be removed..." Yet a subsequent statement indicates that "...approximately 25 cubic yards of topsoil and vegetation" would be required. There appears to be a deficit of 65 cubic yards of backfill material. This should be clarified.

Page 23, Site 3 RAA4: There is a reference to "...6 confirmatory soil samples..." This statement should clearly indicate that these 6 samples will not be composite samples.

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

Sincerely,

Peter T. Knight
NOAA - Coastal Resource Coordinator