COMMENTS ON INTERIM FINAL RECORD OF DECISION FOR SITES 1 AND 3 NWS YORKTOWN VA
8/10/1998
NOAA

8/10/98-01410

August 10, 1998

Ms. Barbara Okorn (3HS41)
BTAG Coordinator
EPA - Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: NWS Yorktown

Dear Ms. Okorn:

Thank you for the opportunity to provide comments on the May 1998 Interim Final Record of Decision for Operable Unit Nos. VIII and IX, Site 1 - Dudley Road Landfill an Site 3 - Group 16 Magazines Landfill, Naval Weapons Station Yorktown, Yorktown, Virginia. The following comments are made on behalf of the National Oceanic and Atmospheric Administration (NOAA).

The selected remedy has not changed from the draft ROD.

On page 2-41, section 2.6.2.1 (Site 1 Terrestrial Ecological Risk): The statement is made that because surface soil concentrations of Al, Cr, Fe, and V were below background upper confidence levels "...these contaminants were not retained as COPCs for further evaluation in the FS." This statement should more clearly indicate that this decision was a risk management decision and not necessarily related to ecological risk.

Page 2-41, section 2.6.2.1: The statement is made that "...lead was not considered as a Site 1 soil COPC in the FS" because "...only one soil sample (62.3 mg/kg) collected at Site 1 exceeded the maximum background lead concentration (43.1 mg/kg." This conclusion does not take into account the potential fact that this may be a hot spot of lead contamination which does warrant remediation, especially if it is not co-located with the As contaminated soil that is selected for excavation. This potential situation should be more clearly identified in the text of this interim final ROD.

Page 2-42, section 2.6.2.2 (Site 3 Proper): The statement is made that concentrations of antimony, lead, and manganese "...were not detected at values significantly greater than background ranges." While this may be true, this statement says nothing about the potential for ecological receptors to be adversely impacted by these concentrations. This statement should contain a reference to the background range in comparison with the toxicity benchmark value. While the conclusion, "Due to comparisons to background ranges and sporadic detections, the inorganics detected in

the soil collected from Site 3 Proper were not retained as COPCs in the FS," is one interpretation of the data; an alternative interpretation (i.e. these data indicate a hot spot(s) of contamination) is also available, and based on the data supplied, equally defensible. This section should be clarified.

Page 2-42, section 2.6.2.2 (Site 3 - PAH-Contaminated Soil Hot Spot): The statements about soil concentrations of Pb, Mn, Hg, and Zn being greater than background; and acknowledging that inorganic terrestrial risk is based on one soil sample from the PAH hot spot, does not support the conclusion that "The PAHs were determined to be the primary COPCs in this area; therefore, the inorganics were not retained for further consideration in the FS." Additional statements about the lack of ecological risk (compare background data with toxicity data) would help support this decision about inorganics in soils.

A number of previous comments on the draft ROD do not appear to have been addressed in this interim final version of the ROD. These comments are:

- The remedial actions outlined for Sites 1 and 3 do not include post-remediation surface water or sediment sampling in Indian Field Creek, which likely provides habitat for a number of species of concern to NOAA including killifish, mummichog, silversides, weakfish, flounder, blue crab, eastern oyster, and soft shell clams. Five or six stations downstream of Sites 1 and 3 in Indian Field Creek should be identified for surface water and sediment sampling in order to assess the effectiveness of these remedial actions and the potential risk to aquatic receptors utilizing this creek. This sampling could be in conjunction with post-remediation monitoring at other sites in the Indian Field Creek watershed. Reference sampling stations located upstream of Sites 1 and 3 in Indian Field Creek do not appear possible, therefore an adjacent or nearby watershed should be identified for this purpose. Existing data from Indian Field Creek could be used for baseline information. Chemical analysis should include testing for all contaminants of potential concern from these sites. Sampling frequency is recommended, at a minimum, to occur pre-construction, the first year following remediation and every other year for ten years thereafter.

- Previous data collected at the site and summarized in Tables 1 and 2 (attached) indicate that zinc was detected at elevated concentrations in Site 1 and 3 soils (190 mg/kg and 203 mg/kg, respectively) and in Site 1 groundwater (2,850 (g/L). The document did not identify zinc as driving the remediation decisions, however it would be useful to know if the

expected remedies at these sites will remove the soils where these high concentrations of zinc were found and, if not, if this could be accomplished at little extra cost.

- The document states that the backfill to be used following excavation will come from NWS Yorktown's borrow pit. Clarification should be provided to ensure that this material is free of contaminants and suitable for revegetation.

If you have any questions, please contact me at (215) 814-3321.

Sincerely,

Peter T. Knight
NOAA - Coastal Resource Coordinator

Attachment: as stated

organisms
(EPA 1993).

Site	Chemical	Groundwater (µg/L)		Surface Water (µg/L)		AWQC
		Round 1	Round 2	Round 1	Round 2	
Site 1	Cadmium	<4.0	9.0	<4.0	8.5	1.1+
	Copper	<5.0	28	14	22	12+
	Mercury	<0.1	ND	0.11	ND	0.012
	Zinc	1,080	2,850	270	16	110+
Site 3	Cadmium	<4.0	2.9	<7	8.5	1.1+
	Chromium	<8.0	7.3	14	ND	11
	Copper	5.2	3.9	12	22	12+

ND: Not detected; detection limit was not presented.+: Hardness-dependent criteria.