

N00109.AR.002542
NWS YORKTOWN
5090.3a

LETTER AND U S EPA REGION III RESPONSE TO U S NAVY RESPONSE TO COMMENTS
TO DRAFT REVISED SAMPLING AND ANALYSIS PLAN REMEDIAL INVESTIGATION SITE
31 NWS YORKTOWN VA
11/5/2012
U S EPA REGION III



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

November 5, 2012

Mr. James Gravette
Naval Facilities Engineering Command (Navy)
1510 Gilbert Avenue
Building N-26, Room 3300
Norfolk, VA 23511-3095

Re: *Response to Comments Draft Revised Sampling and Analysis Plan
Site 31 Remedial Investigation, Naval Weapons Station Yorktown, Yorktown, Virginia
dated October 15, 2012*

Dear Mr. Gravette:

The United States Environmental Protection Agency Region III (USEPA) has reviewed Navy's *Response to Comments Draft Revised Sampling and Analysis Plan Site 31 Remedial Investigation, Naval Weapons Station Yorktown, Yorktown, Virginia dated October 15, 2012*. Please be advised that all of USEPA's comments were satisfactory except for the below:

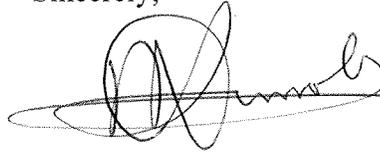
Response 8: The Navy's response to Comment 8 concluded that SSLs will be used as an additional line of evidence for characterizing the site, but not for triggering future site management decisions. USEPA believes that exceedances of SSLs should not be the only trigger for taking a remedial action at a site; SSLs are much too conservative, to be used in such a way. However, if groundwater is contaminated, then one of the goals would be to identify and eliminate the source of that contamination. SSLs can point toward such a source, increasing the chance of a successful groundwater remedy.

USEPA strongly recommends that SSLs (preferably site-specific, rather than generic) be paired with groundwater contaminants to help focus the feasibility study for this site.



If you have any questions, please contact me at (215) 814-3362 or via e-mail at oduwole.moshood@epa.gov .

Sincerely,

A handwritten signature in black ink, appearing to read 'Moshood Oduwole', with a long horizontal flourish extending to the right.

Moshood Oduwole, Remedial Project Manager
NPL/BRAC Federal Facilities Branch.

cc: Wade Smith, VADEQ

