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LETTER AND U S NAVY RESPONSE TO U S EPA REGION III FOLLOW-UP RESPONSE TO
COMMENTS TO DRAFT REVISED SAMPLING AND ANALYSIS PLAN REMEDIAL
INVESTIGATION SITE 31 NWS YORKTOWN VA
11/12/2012
CH2M HILL



CH2M HILL
3201 Beechleaf Court
Suite 300
Raleigh, NC 27604
Tel 919.875.4311
Fax 919.875.8491

November 12, 2012

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Mr. Moshood Oduwole, Remedial Project Manager
NPL/BRAC Federal Facilities Branch (3HS11)
United States Environmental Protection Agency, Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103

Subject: Response to Comments *Draft Revised Sampling and Analysis Plan
Site 31 Remedial Investigation, Naval Weapons Station Yorktown, Yorktown Virginia*

Dear Mr. Oduwole:

This letter is in response to the USEPA's follow-up response to Comment 8, in a letter dated November 5, 2012. Comments are shown followed by responses in italics.

8. [Original Comment] In SAP Worksheets #15-8 through #15-16, risk-based screening levels for determining Contaminants of Potential Concern are provided. For soil, in addition to the direct contact screening levels provided in the tables, comparison to soil-to-groundwater migration values should also be performed. Many chemicals, primarily VOCs, have much higher direct contact screening levels than soil-to-groundwater migration values. In order to rule out soil as a continuing source of groundwater contamination, the latter comparison needs to be made.

[Original Response] Response 8: The Project Action Limit has been selected as the risk-based screening levels. As discussed in Worksheet 11, the soil to groundwater screening levels (SSLs) will be used to support additional lines of evidence for characterizing the Site but will not be considered action limits that will trigger future site management decisions. Because of this, the numerical values of the SSLs are not provided in Worksheet 15's.

USEPA Response: 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.

Response: Agreed. The generic SSLs listed in the Regional Screening Levels (RSLs) for Region 3 are understood to be a conservative measure of soils, which when leach, may result in groundwater concentrations above an MCL or risk-based value. All detected soils will be compared to the EPA SSL value to determine if it is acceptable for use or whether less conservative, site-specific SSL values should be calculated in accordance with EPAs 'Soil Screening Guidance: User Guide' (July, 1995). For those compounds with no SSL established, the Navy will discuss with the EPA other lines of evidence to come to an agreement as to whether its chemical specific SSL should be calculated. The comparison of soil data to generic or site-specific calculated SSLs will be considered along with the groundwater concentrations in order to identify the appropriate list of compounds to be carried forward in the FS.

Sincerely,

CH2M HILL

A handwritten signature in black ink, appearing to read 'Kristin Rogers', written over a light blue horizontal line.

Kristin Rogers
Project Manager

cc: Mr. Jim Gravette/NAVFAC
Mr. Wade Smith/VDEQ
Mr. Bill Friedmann/CH2M HILL
Mr. Adam Forshey/CH2M HILL