

N00109.AR.002710
NWS YORKTOWN
5090.3a

EMAIL AND U S NAVY RESPONSE TO U S EPA COMMENTS ON SAMPLING AND
ANALYSIS PLAN SITES 9 AND 19 NWS YORKTOWN VA

05/19/2014
CH2M HILL

Hunt, Renee/MKE

From: Friedmann, William/VBO
Sent: Monday, May 19, 2014 7:42 AM
To: 'Oduwole, Moshood'
Cc: Gravette, James CIV NAVFAC; Doran, Karen (DEQ); Smith,Wade; bryan.peed@navy.mil; Hunt, Renee/MKE; Anderson, Mary/VBO; Brickman, Kristin/RAL
Subject: Site 9/19 RTCs to EPA April 18 Comments
Attachments: RTC_Cover Letter 05192014.doc; USEPA Yorktown RTC Nov13 SAP Loading Plant RI.docx; Response to USEPA 4-18-14 Comments_Sites 9_19_draft.xlsx

Good morning Moshood,
Attached please find a cover letter, the EPA April 18th comments, and the Navy RTC for the Site 9/19 UFP-SAP. These were a response to a previous response letter and there are only two comments and response to this round. In accordance to your requested timeframe for reviews, we are asking for the EPA's response no later than June 18, 2014.

If you have any comments or questions, please don't hesitate to call.

Thanks,

Bill



William J. Friedmann, Jr.
Project Manager/Hydrogeologist
CH2M HILL, Inc.
5701 Cleveland Street, Suite 200
Virginia Beach, VA 23462
Ph: 757-671-6223
Cell: 757-285-3985
Fx: 757-497-6885
E-mail: william.friedmann@ch2m.com

Reviewer: USEPA

Response to Comments for November 2013 Draft Sampling and Analysis Plan, Loading Plant No. 1

Document: (including Site 9 and Site 19) Remedial Investigation, NWS Yorktown, VA, March 2014

Date: 18-Apr-14

Comment Number	Worksheet and/or Section	Comment	Response
1	Worksheet #11	<p>Comment 2 stated that the basis for the remedial goal of 15,000 µg/kg for TNT needed to be provided if used to evaluate ecological risk in the current investigation to ensure it is based on current scientific information and still protective of ecological receptors. The RTC states that ecological risk calculations were performed to evaluate the current protectiveness of this remedial goal. The results of the ecological calculations indicated that a proposed remedial goal of 17,300 µg/kg would be protective and therefore, the current remedial goal remains protective. However, the basis for this ecological calculation is not provided, including what receptor this value was calculated for and whether it would be protective of all potential receptors. Additional information must be provided to support the use of this value.</p>	<p>This value is based on terrestrial plant exposures. Talmage et al. (1999) report a NOEC of 10,000 µg/kg for TNT and a LOEC of 30,000 µg/kg. The geometric mean (MATC) of the NOEC and LOEC is 17,300 µg/kg; this value is considered protective. Corresponding values for soil invertebrates are much higher (NOEC of 100,000 µg/kg and LOEC of 140,000 µg/kg). TNT is not considered a bioaccumulative chemical; thus, food web exposures are not relevant.</p>
2	Worksheet #11	<p>Comment 3 stated that sampling in the drainage ditches should be timed to occur when water is present, since water may only be present during certain times of the year (seasonally or after rain events). The RTC states that surface water flows within these drainage ditches are primarily influenced by rainwater runoff and the drainage ditches are dry throughout much of the year. The RTC further states that it is recommended that surface water sampling not be planned to coincide with rain events and instead be collected several days following a rain event and only if pooled water is present. It is during these rain events that contamination from the site may be mobilized into surface water. Therefore, if surface water is only present in these drainage ditches following rain events, surface water should be sampled shortly after a rain event to capture this migration pathway.</p>	<p>At the request of the USEPA, surface water samples will be collected one or two days following a rain event.</p>