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RESPONSE TO THE U S EPA REGION III COMMENTS ON THE DRAFT SAMPLING AND ANALYSIS PLAN SITE INSPECTION SITE 33 FORMER BUILDING 530 PAINT SHOP AND SAND BLASTING OPERATIONS NWS YORKTOWN VA

06/05/2014

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Reviewer: USEPA

Document: Draft Sampling and Analysis Plan, Site Inspection Site 33, Former Building 530 Paint Shop and Sand Blasting Operations, NWS Yorktown, VA

Comments Dated: 05-Jun-14

Comment Number	Worksheet and/or Section	Comment	Response
1	Worksheet #11	Comment 4 stated that it was unclear what was meant by an "ecological risk screening" and whether it would include all relevant exposure pathways and assessment endpoints. The response to comments (RTC) states "The ecological risk screening will be a streamlined version of a standard Step 3A ERA and will evaluate all relevant complete exposure pathways." Please explain/define what is meant by a streamlined version. Specifically indicate if steps one and two of the ecological risk assessment will be included in this streamlined version.	The risk screening will include Steps 1, 2, and 3A of the risk assessment for all detected constituents. Non-detect constituents will not be included.
2	General	Comment 7 stated that information should be provided to confirm that absence of contamination at the location of the former underground storage tank. The RTC states that soil exceeding cleanup standards was removed and the SAP text will be modified to provide additional detail regarding the sampling performed. The cleanup standard that was used should be provided. If not evident, an explanation should be provided detailing how the standards are protection of ecological receptors.	The UST Program's established cleanup goal during the 1996 removal was 100 ppm for total petroleum hydrocarbons (TPH). Subsurface soil exceeding the TPH cleanup goal was located between 5 to 10 feet below ground surface and all soil (including surface soil) in the vicinity of the former tank was excavated to below that level and removed for off-site disposal and replaced with fill. This removal met all requirements for remediation under the UST program, and no further investigation into the soils potentially impacted by the UST is planned for this Site Inspection.
3	Worksheet #10	Worksheet 10 on page 37 states that there are drainage swales located along the west and south sides of the site of the former buildings and parking lot area and surface water runoff flows away from the site to the north, east, and south. This section should clarify whether sediment samples in these drainages have historically been collected for chemical analysis, since the figures provided do not show any historical sampling. If historical sediment samples were not collected, sediment and surface water should be analyzed as part of the current investigation based on the steep topography and the documented historical releases to soil prior to the soil removal in 1999-2000. BTAG does not support the statement in Worksheet 11 on page 47 that the need for surface water and sediment sampling is dependent upon soil concentrations since there is sufficient information to conclude that a release to these drainages may have already occurred.	Sediment and surface water samples were not collected during previous investigation activities as these media were not present within the historical Site 33 boundary. Additionally, historical soil data did not indicate that metals contamination could have impacted the off-site surface water features. The "Previous Investigations and Remedial Action" section of Worksheet 10 has been modified to clarify that these media were not previously sampled at Site 33. The drainage swales located to the north, west, and east of Site 33 are ephemeral water bodies that only contain water during heavy rain events. As shown on Figure 6 of the SAP, soil sampling is already proposed within these drainage swales. The stream located to the south of Site 33 receives the majority of it's flow from east of Bollman Road, with limited contribution from Site 33 runoff during heavy rain events. Soil samples are proposed within the drainage swale as wells as the former parking area leading to the southern stream. The Navy maintains that sampling of the southern stream is not necessary during the initial stages of the Site Inspection (SI). If soil or groundwater data from the initial stage of the SI indicate that contamination may have impacted the southern stream, then media within this water body would be analyzed for the constituents of potential concern.