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NWS YORKTOWN
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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

11/17/2014
CH2M HILL

Reviewer: USEPA

Draft Sampling and Analysis Plan, Site Inspection Site 33, Former Building 530 Paint Shop and Sand

Document: Blasting Operations, NWS Yorktown, VA

Comments

Dated: 17-Nov-14

Comment Number	Worksheet and/or Section	Comment	Response
1	Worksheet #11	Comment 1 stated that components of the streamlined ecological risk assessment should be provided, specifically whether they include Steps 1 and 2. The RTC indicates the ERA will include Steps 1, 2, and 3A for all detected constituents and that non-detected constituents will not be included. If the reporting limit for any contaminant equals or exceeds the respective ecological screening value or an ecological screening value does not exist, then the non-detected contaminant needs to be addressed in the uncertainty section.	<p>If the reporting limit for any contaminant equals or exceeds the respective ecological screening value or an ecological screening value does not exist, the non-detected contaminant will be discussed in the uncertainty section.</p> <p>This USEPA comment is very similar to USEPA comment #3 provided to NAVFAC on March 10, 2014, which also requested that compounds with a limit of detection exceeding the project action limit be included in the uncertainty section. The response provided to that previous USEPA comment was, "Non-detected constituents that exceed ESVs (PALs) will be addressed in the uncertainty section. The sentence indicating that the analyte will be considered not present will be deleted from the text."</p>
2	Worksheet #10	Comment 3 recommended that surface water and sediment samples be collected in the stream south of the site. The RTC indicates that the stream south of the site will not be included in the proposed sampling. Based upon Figure 6, this stream is directly connected to the intermittent drainage ditch east of the site where soil removal occurred in 1999/2000. Because of this direct connection to this area, additional samples within this southern drainage feature, between the railroad bed and sample SO21, need to be included in this SAP. In addition, sampling of the depositional area downgradient of SO21 may be needed if depositional areas are limited or do not exist between the railroad bed and SO21. BTAG representatives recall from site visits that the southern and western drainages are scoured and may not be depositional.	<p>The Navy maintains that sampling of the southern stream is not necessary during the initial stages of the Site Inspection (SI). Following the initial stage of the SI, the Partnering Team will utilize the groundwater and soil results to determine what COPCs may have impacted nearby waterbodies. A sampling approach (including sample location and analytes) for surface water and sediment that may have been impacted by historical site activities will be developed at that time.</p>