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LETTER AND THE U S EPA REGION III COMMENTS REGARDING THE DRAFT
ENGINEERING EVALUATION/COST ANALYSIS SITE 24 AVIATION FIELD NWS YORKTOWN
VA
02/17/2015
U S EPA REGION III PHILADELPHIA PA



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

February 17, 2015

Bryan Peed
Naval Facilities Engineering Command
9742 Maryland Ave.
Building N-26, Suite 3300
Norfolk, VA 23511

Re: Draft Engineering Evaluation / Cost Analysis, Site 24 - Aviation Field; Naval Weapons Station Yorktown, Yorktown, Virginia; December 2014

Dear Mr. Peed:

The United States Environmental Protection Agency Region III (USEPA) has reviewed the Draft *Engineering Evaluation / Cost Analysis, Site 24 - Aviation Field; Naval Weapons Station Yorktown, Yorktown, Virginia* dated December 2014. USEPA comments on the report are provided below:

1. Section 2.4 on page 2-7 discusses the development of cleanup goals to address human health and ecological contaminants of concern (COCs). Table 2-3 shows cleanup goals selected to address human health risk. The selected cleanup goals to address human health risk for both cadmium (70 milligrams/kilogram [mg/kg]) and copper (3,043 mg/kg) are above the ecological soil screening levels protective of plants for cadmium (32 mg/kg) and protective of plants (70 mg/kg) and soil invertebrates (80 mg/kg) for copper. If concentrations in soil exceed these cleanup goals, it is unclear why cadmium and copper were not selected as COCs from the ecological risk assessment. If they were not identified as COCs for ecological risk because these concentrations were in the subsurface (greater than 2 feet below the surface), any areas with concentrations between the human health cleanup goal and ecological soil screening levels may need land use controls to ensure contaminated soils remain buried and cannot present ecological risk in the future. This issue should be clarified.
2. Section 4.1.3 on pages 4-2 and 4-3 provides a description of Alternative 3 (Excavation and Offsite Disposal). This alternative is the recommended alternative. The first bullet under "Backfill" on page 4-3 states that general fill and topsoil will be "Certified as clean through analytical testing for target compound list VOCs, SVOCs, pesticides/PCBs, and



metals, and comparison to USEPA RSLs and WPNSTA Yorktown background levels.” Measures must be taken to ensure that concentrations in the fill and topsoil are also consistent with ecologically protective values. This issue should be clarified.

3. Table 2-2, Calculation of Human-Health Based Soil Preliminary Remediation Goals – The Hazard Quotients for ingestion and dermal exposure appeared incorrect for both Aroclor-1254 and copper for the construction worker. Please verify and recalculate the PRGs for Aroclor-1254 and copper if necessary. Subsequent changes may also be needed in Table 2-3.
4. Applicable or Relevant and Appropriate Requirements – It is recognized that Federal and Virginia chemical-specific ARARs are not available for the 4 COCs; however, chemical-specific PRGs were developed in Tables 2-2 and 2-3 in Section 2. The application of the PRGs as risk-based ARARs should be discussed in Section 3, as these values will be used to determine when the removal action is completed. As the document currently stands, there is a disconnect between the development of the PRGs in Section 2, the determination that certain ARARs are not available in Section 3, and the compliance with ARARs in Section 4 (particularly Section 4.2.2. and Table 4-1). It is recommended that this disconnect be clarified.

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

Sincerely,



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

cc: Wade Smith, VADEQ

