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U S EPA REGION III COMMENTS ON THE RESPONSE TO COMMENTS REGARDING THE  
ENGINEERING EVALUATION/COST ANALYSIS SITE 24 AVIATION FIELD NWS YORKTOWN  
VA  
05/18/2015  
U S EPA REGION III PHILADELPHIA PA

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

**SUBJECT:** Comments on the Response-to-Comments for the EE/CA for Site 24 at Naval Weapons Station Yorktown

**FROM:** Martin Gehlhaus, Health Scientist  
Technical Support Branch (3HS41)

**TO:** Moshood Oduwole (3HS11)  
NPL/BRAC Federal Facilities

**DATE:** May 18, 2015

Thank you for the opportunity to review the Response to Comments for the EE/CA for Site 24 at NWS Yorktown. The comments are provided for your consideration.

**Response to Comments:**

- Comment 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.

**Response:** The HQs for ingestion and dermal exposure for Aroclor-1254 and copper for the construction worker were checked against the HQs in Table 9.7.RME in the HHRA Appendix of the RI report and the values are the same as were in Table 2-2. No changes to the document were made.

**Comment:** The information in the following table is pulled directly from Table 9.7.RME (as well as Table 10.5) from the 2014 RI. The construction worker HQs for Aroclor-1254 and for copper (in red) do not match those in Table 2-2 of the EE/CA. Overall, it makes no difference in the PRG, as the PRGs are based on residential risks, but it is important to have the correct information captured in the EE/CA.

COPC	ing	inh	derm	total	primary TO	ing	inh	derm	total
Aroclor-1254	7.8E-07	NA	2.2E-07	1.0E-06	Immune System	9.1E-01	NA	2.6E-01	1.2E+00
Copper	NA	NA	NA	0.0E+00	Gastrointestinal	1.2E+00	NA	2.5E-02	1.2E+00

- Comment 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.

**Response:** Section 3.2 was revised to include a statement that the removal action will be considered complete when the remedial action objective is met. Section 3.4 has been revised to clarify exactly what an ARAR is and that although requirements that are neither promulgated nor enforceable may be used in formulating the remedy they are not ARARs.

**Comment:** The text added to the document is improved; however, please add text highlighting the comparison of PRGs in soil (for Aroclor-1254, aluminum, cadmium, and copper) in Table 2-3 to

the 'Post-Excavation Confirmation Sampling' paragraph on page 4-3. This comparison will be the basis for establishing that the remediation is achieved but it is not mentioned in the document.

Thank you for the opportunity to review this report. If you have any questions, comments, or concerns, please contact me.