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LETTER AND THE U S NAVY RESPONSE TO THE U S EPA REGION III COMMENTS ON THE DRAFT ENGINEERING EVALUATION/COST ANALYSIS SITE 24 AVIATION FIELD NWS YORKTOWN VA
06/11/2015
CH2M HILL

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June 11, 2015

Mr. Moshood Oduwole
Federal Facility Remediation (3HS11)
USEPA Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Subject: Response to Comments
Draft Engineering Evaluation/Cost Analysis, Site 24 – Aviation Field
Naval Weapons Station Yorktown
Yorktown, Virginia
Navy CLEAN 8012, Contract N62470-11-D-8012, Contract Task Order WE90

Dear Mr. Oduwole,

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments from USEPA received via email on June 5, 2015 on the *Draft Engineering Evaluation/Cost Analysis, Site 24 – Aviation Field,* Naval Weapons Station Yorktown, Yorktown, Virginia (CH2M HILL, December 2014):

Comment 1: 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

Response: The values will be corrected to those in indicated in red in the table above. The original values were obtained from the draft version of the RI report and will be updated to the values from the final RI.

Comment 2: 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.

Response: The first sentence in the "Post Excavation Confirmation Sampling" section on page 4-3 has been revised to state, "Before backfilling the site occurs, post-excavation confirmation samples would be collected, and the results compared against the soil PRGs for the soil removal in Areas B, C, E, and F (**Table 2-3**) and against the soil PRGs for the hotspot soil removal (**Table 2-4**), to confirm the horizontal and vertical extents of the excavations are sufficient."

Please do not hesitate to contact me at (757) 671-6280 if you have any questions concerning these responses.

Sincerely,

CH2M HILL

Nathaniel Price, P.E.
Project Manager

cc: Mr. Wade Smith/VDEQ
Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Bill Friedmann/CH2M HILL