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FISC WILLIAMSBURG  
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LETTER REGARDING U S EPA REGION III COMMENTS ON U S NAVY RESPONSES TO  
COMMENTS ROUND 2 ON DRAFT TIER II SAMPLING AND ANALYSIS PLAN FOR AREA OF  
CONCERN 8 (AOC 8) AREA SOUTH OF SITE 7 REMEDIAL INVESTIGATION FISC  
WILLIAMSBURG VA  
5/30/2013  
U S EPA REGION III



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

May 30, 2013

Mr. Scott Park  
NAVFAC MIDLANT, Building N-26, Room 3208  
Attention: Code OPHE3, Mr. Scott Park  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Subject: Round 2 Response to Comments, Remedial Investigation, Sampling and Analysis Plan,  
AOC 8 – Area South of Site 7, Naval Weapons Station Yorktown Cheatham Annex,  
Williamsburg, Virginia, April 9, 2013

Mr. Park:

Thank you for the opportunity to review the subject document. One response requires further discussion. All other comments are acceptable.

EPA comment 5 stated that the initial and final COPCs for plants and invertebrates need to be based on maximum concentrations, not mean concentrations. The RTC states that in Step 3A, central tendency exposure point concentrations (mean and 95% UCL) will be a primary consideration in determining if a chemical should be identified as a COPC. The RTC goes on to indicate that other factors (e.g., magnitude of the maximum HQ and spatial pattern of screening value exceedances) will also be considered when making this determination. While central tendency concentrations can be considered as part of Step 3A, risk to plants and invertebrates should not be eliminated based on this comparison alone. Because these receptors have no or limited mobility, more emphasis should be placed on 95% UCL and maximum concentrations and the spatial pattern of screening value exceedances when determining what chemicals should be COPCs.

If you have any questions, please contact me at 215-814-3394.

Sincerely,

A handwritten signature in blue ink that reads "Susanne Haug".

Susanne Haug, P.E.  
NPL/BRAC Federal Facilities Branch

cc: Wade Smith, VDEQ