

N60138.AR.003110  
FISC WILLIAMSBURG  
5090.3a

U S NAVY RESPONSES TO COMMENTS ROUND 3 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  
6/3/2013  
NAVFAC MID ATLANTIC

**Round 3 Response to Comments**  
**Remedial Investigation**  
**Sampling and Analysis Plan**  
**AOC 8 – Area South of Site 7**  
**Naval Weapons Station Yorktown Cheatham Annex**  
**Williamsburg, VA**  
**June 3, 2013**

Comments received by email on May 30, 2013 from Susanne Haug, Environmental Protection Agency, Region 3.

*EPA Comment #1: 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.*

Navy Response: Comment noted. A draft AOC 8 RI Report will be submitted to the EPA for review prior to finalization. During their review of the draft RI Report, the EPA can provide comments on the method used to eliminate COPCs. No changes were made to the SAP.