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COMMENTS ON DRAFT WORK PLAN FOR SITE 12 LONG TERM MONITORING NWS
YORKTOWN VA
6/15/1998
NOAA

6/15/98-01405

June 15, 1998

Ms. Barbara Okorn (3HS41)
BTAG Coordinator
EPA - Region III
841 Chestnut Street
Philadelphia, PA 19107

RE: NWS Yorktown

Dear Ms. Okorn:

Thank you for the opportunity to provide comments on the March 11, 1998 Draft Work Plan for Site 12 - Long Term Monitoring at the Naval Weapons Station Yorktown, Yorktown, Virginia. The following comments are made on behalf of the National Oceanic and Atmospheric Administration (NOAA).

In a comment letter of 7/10/96, EPA indicated "...there is insufficient data at this point in time to arrive at a Record of Decision for Area B/C, the wood debris disposal area, and groundwater in the vicinity of Site 12. This is especially true for the evaluation of ecological risk at these areas within Site 12." Based on this determination, the rationale used to include these same areas in this ROD needs to be explicitly justified. The data collection effort described in this long term monitoring work plan does not clearly indicate how this "...insufficient data..." gap is to be filled.

A previous comment on the ROD indicated that sediment bioassays and fish tissue analysis needed to be included in the long term monitoring effort. The collection of this type of data is not addressed in this work plan. In addition, there was an effort to include fish tissue data collection in an additional study effort funded by EPA. But due to funding issues, these data may not be collected in a timely manner. Inclusion of these data collection/analyses should be discussed in this work plan.

The sediment data collection effort outlined in this work plan may infer potential impacts to Ballard Creek, although they would be monitored indirectly. Sediment analytical results should be compared to Region III BTAG sediment screening values, or other appropriate screening guidelines, to assess whether contaminants in sediments of Ballard Creek occur at concentrations that could threaten aquatic resources in the creek.

Considering that sediment contamination in Ballard Creek immediately adjacent to Site 12 was reported to be at concentrations that could threaten aquatic resources using the creek, fish tissue sampling and sediment bioassays may still be advisable for sediments immediately adjacent to Site 12. Depending upon the sediment analytical results from long term monitoring (LTM), if contaminant concentrations in sediments upstream and downstream of the site are at concentrations that could threaten aquatic resources, then sediment bioassays and/or fish tissue sampling may need to be expanded beyond the immediate site vicinity.

For the first year of the LTM, sediment bioassays and fish tissue sampling and analysis should be conducted at sampling locations in the immediate vicinity of the site. Depending upon the results of the bioassays and tissue sampling, the decision can be made as to whether additional studies are needed or whether such testing and sampling should be continued in subsequent years.

If the results of the LTM indicate that contaminants in the sediments of Ballard Creek are impacting, or potentially impacting, biota in the creek, a decision will need to be made regarding possible remediation of sediment contamination in the creek. According to the draft WP on page ES-1 of the document, the purpose of the LTM is "...to monitor the groundwater and sediment at and near Site 12 to determine the potential impact of contaminants [such as trichloroethene (TCE)] in shallow and on deeper groundwater, and the sediment of Ballard Creek." However, the draft WP did not indicate what actions would be taken if the results of the LTM did find impacts. The WP should be expanded to discuss what actions will be taken in the event that substantial sediment contamination is detected. Data resulting from monitoring of Ballard Creek could be used to support a more in-depth ecological risk assessment of Ballard Creek (to supplement that presented in the Draft Final Round Two Remedial Investigation Report) to determine the extent of any impacts to the creek and to help determine what, if any, remediation may be necessary in the creek.

EPA (7/10/96 letter) indicated that because of inadequate information collected to date, a focused RI would need to be conducted on the other areas at Site 12, except the soils at Area A. The ROD suggests that this focused RI would not be conducted. NOAA is concerned that the potential long-term monitoring program at Site 12 may not provide adequate information to support a focused RI and ecological risk assessment for Ballard Creek. This work plan should include this focused RI level of investigation and/or monitoring.

The draft WP did not indicate that results from the LTM would be used to support either a focused RI or an ERA. The sediment data collected from Ballard Creek could be used to support a screening level risk assessment, however, such a risk assessment has already been done and was included in Draft Final Round Two Remedial Investigation Report. If a more in-depth ERA is contemplated for Ballard Creek, the LTM should be designed with this in mind, and include sediment bioassays and fish tissue sampling.

Page ES-7: The statement is made that surface sediment samples (0-4 inches bgs) will be collected. The biologically active zone is closer to 0-4 cm. If there is concern that contamination may be at depth, then a discrete sediment sample at the 27.9 - 30.5 cm (11-12 inch) depth should be added at each sampling location.

Page ES-7: The statement is made that "One of the 12 sediment samples will be analyzed for TOC, grain size...." All of the sediment samples should be analyzed for TOC and grain size. Also, this statement refers to 12 sediment samples. Figure 3-3 indicates 15 sediment sample locations. The number of sediment samples should be consistent.

Table ES-1 indicates that 4 sediment samples will be analyzed for extended PAH scan. If PAHs are contaminants of concern, then all of the sediment samples should be analyzed for PAHs, particularly in the first year of sampling.

Table ES-1 also indicates that pH will only be determined in one sample. Again, as indicated before, all sediment samples should have the pH measured. This is particularly important because of the variability that can occur in sediment data.

If you have any questions, please contact me at (215) 566-3321.

Sincerely,

Peter T. Knight
NOAA - Coastal Resource Coordinator