

N00109.AR.001409
NWS YORKTOWN
5090.3a

COMMENTS ON DRAFT RECORD OF DECISION FOR SITE 11 ABANDONED EXPLOSIVES
BURNING PIT AND SITE 17 NWS YORKTOWN VA

8/10/1998
NOAA

8/10/98-01409

August 10, 1998

Ms. Barbara Okorn (3HS41)
BTAG Coordinator
EPA - Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: NWS Yorktown

Dear Ms. Okorn:

Thank you for the opportunity to provide comments on the March 1998 Draft Record of Decision for Operable Unit Nos. X and XI, Site 11 - Abandoned Explosives Burning Pits and Site 17 - Holm Road Landfill, Naval Weapons Station Yorktown, Yorktown, Virginia. The following comments are made on behalf of the National Oceanic and Atmospheric Administration (NOAA).

The information presented in the document reviewed essentially repeated information provided in the feasibility study. No substantial changes were noted in the selected remedies discussed. The main concerns at these sites with respect to NOAA's interests are that groundwater contaminated with trace elements and explosive compounds may migrate to surface water bodies and pose a risk to NOAA trust resources, and that site-related compounds may have already migrated to these habitats through runoff and surface water transport. The selected remedial actions will not address these concerns. Further groundwater sampling beneath Site 11 and surface water/sediment sampling of Indian Field Creek including groundwater discharge areas is recommended to determine the potential need for further investigation or remediation.

On page 2-10, one of the reasons used to support the No Action decision for OU X is listed as, "...all of the flora and fauna benchmark toxicity values have a low to moderate degree of uncertainty associated with them." A low to moderate degree of uncertainty would be interpreted to be more certain than a moderate to high degree of uncertainty. Therefore, this would likely not support a no action decision. Should the statement be changed or should the decision be changed?

On page 2-10, the following sentences appear in relationship to OU XI, "With respect to ecological concerns, there may be a potential risk to terrestrial receptors due to the presence of several inorganic compounds. The remedial action for OU XI will reduce this potential ecological risk." This statement should clarify that this reduced potential of ecological risk will occur within the area of excavation and does or does not

include the highest inorganic contaminant concentrations. Also, the area that will remain a risk to ecological receptors resulting from inorganic contaminant concentrations should also be identified.

Page 2-11, section 2.5 (Summary of Site Characteristics): In the third line of the first paragraph, the statement is made, "Low concentrations of pesticides and nitramines, and inorganic concentrations slightly exceeding the maximum Station-wide levels were detected within the surface soil samples." Should this sentence be changed to: "...the maximum Station-side background levels....?"

Page 2-11, section 2.5: The last sentence in the second paragraph says, "Several inorganics exceeded Station-wide background concentrations." The media in which these inorganics were found should be identified.

Page 2-37, Table 2-15 (Groundwater samples at Site 11): There is concern that the values listed for normal upper 95% confidence interval for 4-amino-2,6-DNT (1.47) and RDX (6.66) are not correct, especially when the maximum detected concentrations were 1,400 and 6,200 (g/L respectively. These values should be recalculated and changed, if necessary.

Page 2-38, Table 2-16 (Surface soil samples at Site 17): Only one column of data (normal upper 95% confidence interval) indicates the values may be from Site 17 soil AOC, Site 17 soil AOC/Site 17 Proper data, or just Site 17 Proper data. None of the other columns of data indicate these same differences. What do these other data represent...the entire data set (site 17 soil AOC and Site 17 proper data)? This should be clarified.

Page 2-41, section 2.6.2.3 (Ecological Risk Characterization Information): In the Site 11 Risk Characterization Summary, the statement is made, "Due to the lack of aquatic benchmark values, it was assumed that the benthic community at Site 11 potentially may be adversely affected by sediment concentrations of aluminum, cobalt, and vanadium." Does the lack of aquatic benchmarks apply to all of the contaminants found in the aquatic environment or just for the 3 specific compounds mentioned (Al, Co, and V)?

Another statement in this same section indicates, "The least conservative scenario for aquatic receptor modeling did not indicate risk from the sediment." This statement suggests that the most conservative aquatic receptor modeling did indicate a risk from the sediment. This statement should also be made in the text.

The last two sentences of this site 11 risk characterization summary, appearing

on page 2-43, appear to be disconnected. These two sentences say, "The ecological RA concluded that Site 11 has limited ecological risk associated with surface soil samples primarily for inorganic analytes. Antimony, chromium, copper, lead, mercury, silver, and zinc were detected above Station background concentrations." The connection between the limited ecological risk and the inorganic contaminants that exceed station background values needs to be more completely explained.

Page 2-43, Site 17 Risk Characterization Summary: The second paragraph of this summary indicates "The terrestrial flora and fauna community in Site 17 Proper is adversely influenced by (should be by) soil concentrations of SVOCs, aluminum, chromium, cyanide, iron, lead, mercury, and vanadium. Terrestrial receptors may be adversely impacted by surface soil concentrations of aluminum, chromium, copper, iron, lead, mercury, and vanadium. Site 17 Proper surface soil concentrations of aluminum, chromium, cyanide, iron, and vanadium were detected below background concentration. The primary ECOCs at Site 17 Proper that exceeded background concentrations included SVOCs, copper, lead, and mercury." The connection between this adverse influence of terrestrial receptors and the selected response action for Site 17 Proper needs to be clarified, especially when the selected remedy only involves Site 17 AOC and not Site 17 Proper. In fact, the description of the remedial alternatives for Site 17 (section 2.7) only identifies risk associated with carcinogenic SVOCs (human health?). This would appear to discount ecological risk identified in the Site 17 Risk Characterization Summary on page 2-43. This should be clarified.

Page 2-57, section 2.9 (Selected Remedy): Because contamination will be left on site at both OUs, monitoring would be necessary to confirm that the selected remedy is protective of the environment.

If you have any questions, please contact me at (215) 814-3321.

Sincerely,

Peter T. Knight
NOAA - Coastal Resource Coordinator