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RESPONSE TO SEPTEMBER 2014 COMMENTS ON THE SAMPLING AND ANALYSIS PLAN  
SITE INSPECTION SITE 33 FORMER BUILDING 530 PAINT SHOP AND SAND BLASTING  
OPERATIONS NWS YORKTOWN VA  
11/17/2014  
U S EPA REGION III

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

November 17, 2014

**SUBJECT:** Response to September 2014 Comments, Sampling and Analysis Plan, Site 33 Former Building 530 Paint Shop and Sand Blasting Operations; Naval Weapons Station Yorktown, Williamsburg, Virginia; September 2014

**FROM:** Bruce R. Pluta, Coordinator  
Biological Technical Assistance Group

**TO:** Moshood Oduwole (3HS11)  
NPL/BRAC Federal Facilities Branch

In response to your request, representatives of the BTAG have completed the review of the subject document and offer the comments presented below. We appreciate the opportunity to provide continuing support on this project.

Comment 1 stated that components of the streamlined ecological risk assessment should be provided, specifically whether they include Steps 1 and 2. The RTC indicates the ERA will include Steps 1, 2, and 3A for all detected constituents and that non-detected constituents will not be included. If the reporting limit for any contaminant equals or exceeds the respective ecological screening value or an ecological screening value does not exist, then the non-detected contaminant needs to be addressed in the uncertainty section.

Comment 3 recommended that surface water and sediment samples be collected in the stream south of the site. The RTC indicates that the stream south of this site will not be included in the proposed sampling. Based upon Figure 6, this stream is directly connected to the intermittent drainage ditch east of the site where soil removal occurred in 1999/2000. Because of this direct connection to this area, additional samples within this southern drainage feature, between the railroad bed and sample SO21, need to be included in this SAP. In addition, sampling of depositional areas downgradient of SO21 may also be needed if depositional areas are limited or do not exist between the railroad bed and SO21. BTAG representatives recall from site visits that the southern and western drainages are scoured and may not be depositional.

Thank you for the opportunity to provide input prior to sampling. Please contact me at x 2380 or John McCloskey at (804) 693-6694 x 5116 if you have questions.