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EMAIL AND U S EPA REGION III COMMENTS ON THE SITE 22 PROPOSED PLAN NWS
YORKTOWN VA
02/25/2012
U S EPA REGION III PHILADELPHIA PA

Marrow, Monica/VBO

From: Moshood Oduwole <Oduwole.Moshood@epamail.epa.gov>
Sent: Saturday, February 25, 2012 12:31 PM
To: Friedmann, William/VBO; wmsmith@deq.virginia.gov; james.gravette@navy.mil; Forshey, Adam/VBO
Subject: Fw: Yorktown Site 22 Proposed Plan - Frank Fritz comments

All,

Please see the below comments on the Site 22 Proposed Plan. Thanks

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----- Forwarded by Moshood Oduwole/R3/USEPA/US on 02/25/2012 12:30 PM -----

From: Frank Fritz/R3/USEPA/US
To: Moshood Oduwole/R3/USEPA/US@EPA
Date: 02/21/2012 04:31 PM
Subject: Yorktown Site 22 Proposed Plan - Frank Fritz comments

This plan is in very good shape. Here are my comments:

Section 1, 2d para. Please delete first sentence ("This plan summarizes . . ."). It repeats a sentence at the end of the paragraph. Eliminate repetition

Section 1, 5th para, 1st sent. Please replace "groundwater; NFA RODs" with "groundwater and NFA RODs". Also, please insert "that" between "surface water" and "have already been signed."

Section 2, Previous GW Invest. Please delete 2d sentence ("Detailed information from these . . ."). This repeats a sentence in Section 1, para. 5.

Section 3, 2d para (i.e., the para just before section 3.1). Please add a sentence like this at the end of the para: "However, the Commonwealth of Virginia regards all groundwater as a potential drinking water source."

Section 3.1, 1st para. Why no discussion of RDX concentrations? Also, in the sentence about heptachlor epoxide, it's not clear whether more than one sample exceeded the RSL. I think so, but it's also possible to read as only one sample exceeded the RSL. Please clarify.

Section 3.2, 1st para. Why no discussion of migration of RDX?

Section 3.3, 1st para, 3rd sentence. Please delete comma between "; and" and "VOC concentrations"

Section 5, 1st para. Please rewrite end of sentence like so: "from actual or threatened releases of hazardous substances (TCE, VC, and RDX) into the environment." This tracks the language of the statute and guidance better.

Section 5.1. 1st para, last sent. Correct misspelling: "identifies". Also, please replace "a non-cancer hazard" with "an acceptable non-cancer hazard"

Section 5.1, 4th para, 1st sentence. Please rewrite the end like so "were above the acceptable limits." Not only cancer risks, but also non-cancer risks, were above acceptable limits.

What is Human Health Risk box. Please correct typo "non-=cancer"; delete equal sign.

Table 3. Why does it not give non-cancer risks for adult and child residents?

Short-term protectiveness. At beginning of paragraph, please compare periods of time needed to achieve protectiveness.

Section 9. At the end, please add the following statement (from Proposed Plan checklist, page 3-16 of EPA's 1999 ROD guidance):

Based on information currently available, the Navy believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other alternatives with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with ARARs ; 3) be cost-effective; 4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable; and 5) satisfy the preference for treatment as a principal element."

Thanks, Frank