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LETTER AND THE U S NAVY RESPONSE TO THE U S EPA REGION III COMMENTS ON THE DRAFT ACTION MEMORANDUM FOR SITE 24 AVIATION FIELD NWS YORKTOWN VA
02/04/2016
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February 4, 2016

Ms. Rashmi Mathur
Federal Facility Remediation (3HS11)
USEPA Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Subject: Response to Comments
Draft Action Memorandum, Site 24 – Aviation Field
Naval Weapons Station Yorktown
Yorktown, Virginia
Navy CLEAN 8012, Contract N62470-11-D-8012, Contract Task Order WE90

Dear Ms. Mathur,

On behalf of the Navy, CH2M HILL is pleased to submit the following response to the comments from USEPA received via email on January 26, 2016 on the *Draft Action Memorandum for Site 24 – Aviation Field,* Naval Weapons Station Yorktown, Yorktown, Virginia (CH2M HILL, November 2015):

Comment 1: From an ecological risk perspective, the preliminary remediation goals (PRGs) that are important are: arsenic (18 mg/kg), mercury (0.24 mg/kg), and PCBs (1.12 mg/kg). The PRG for arsenic is the EcoSSL. The PRG for mercury is the facility background concentration. The PRG for PCBs is high for ecological receptors, but with backfill soil from two to 13 feet deep, risk to ecological receptors would likely be minimal or eliminated. These identified depths of backfill would be for all the areas (including hot spots for ecological risk) to be excavated. Therefore, backfilling will further protect ecological receptors with a clean layer of soil material at least 2 feet to 13 feet deep.

> **Response:** Thank you for your comment. Cleanup to the PRGs is expected to be achieved as a result of the remedy/removal, which has also been established in the final RI and EE/CA. Once backfill has been placed, and vegetative growth established, no further action is the expectation for the site. No changes to the EE/CA or Action Memorandum will be made as a result of this comment.

Comment 2: Most concerning is that the redline changes provided in the April 2015 EE/CA were not incorporated into the draft EE/CA that appears in Attachment 1 of the Action Memorandum for Site 24 – Aviation Field. The EE/CA in Attachment 1 must reflect the redline changes that were proposed in the draft EE/CA dated April 2015.

> **Response:** See attached final EE/CA that was provided for the public comment period. The final EE/CA addresses all EPA comments received prior to finalizing the document. No changes to the final EE/CA were made. The final Action Memorandum will include a copy of the final EE/CA as an attachment.

Comment 3: In addition, the EE/CA establishes the recommended removal action for the site and, because an action is being proposed, the risk-based clean-up goals, referenced in the Action Memorandum and the EE/CA, should be referred to as 'remediation goals (RGs)' rather than 'preliminary remediation goals (PRGs).' The RGs established in Section 2 of the EE/CA must be referenced in the section addressing the post-confirmation sampling (Section 4.1.3) on page 4-3. This was commented on previously but not addressed in the RTC (received April 27, 2014) or by a subsequent comment provided on May 18, 2015.

Response: The removal action is being conducted prior to the ROD and in accordance with EPA ROD guidance, the remediation goals are finalized in the ROD if the remediation goals are needed for any subsequent remedial action. In the case of Site 24, a no further action ROD is planned; therefore, final remediation goals will not be needed for the ROD. The final EE/CA does address the comment in Section 4.1.3 Post-Excavation Confirmation Sampling. See attached final EE/CA that was provided for the public comment period. No changes to the final EE/CA have been made.

Comment 4: Table 2-3 – The construction worker PRGs for Aroclor-1254 and copper should be 1E+1 and 4.3E+3, respectively.

Response: The changes made to Table 2-2 in response to EPA comments on the draft EE/CA were not carried over to Table 2-3. However, it makes no difference in the PRGs, as the PRGs are based on residential risks. No changes to the final EE/CA have been made.

Comment 5: Recognizing that the site may have been used for burning explosives-contaminated waste and other base waste, there may be a need to consider sampling for dioxin in the event that ash, which has not been observed in previous sampling activities, is encountered during removal.

Response: Comment noted. If ash is observed the Navy will work with the removal action contractor and partnering team to determine a path forward.

Please do not hesitate to contact me at (757) 671-6280 if you have any questions concerning these responses.

Sincerely,

CH2M HILL

Nathaniel Price, P.E.
Project Manager

cc: Mr. Wade Smith/VDEQ
Mr. Bryan Peed/NAVFAC Mid-Atlantic
Mr. Bill Friedmann/CH2M HILL