7/6/98-01325

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch St.
Philadelphia, Pennsylvania 19103

July 6, 1998

Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
ATTN: CODE 1822, Mr. Scott Park
Norfolk, VA 23511-2699

RE: Site 6 and 7 RI/FS report and proposed plan comments

Dear Mr. Park:

Thank you for allowing EPA the opportunity to comment on v.2 of the RI/FS report and the proposed remedial action plan for sites 6 and 7 at Naval Weapons Station Yorktown. If you have any questions regarding these comments please contact me at (215) 814-3366 or send me an e-mail message at "STROUD.ROBERT@EPAMAIL.EPA.GOV".

Sincerely,

Robert W. Stroud

Robert W. Stroud, RPM
(3SC50)

cc: Steve Mihalko (VADEQ)
Jeff Harlow (NWSY)

Feasibility Study

It appears that potential risks to certain receptors are not accurately characterized in the text of the report. By comparing the text interpretation of risks to the summaries presented in Tables 2-2 and 2-3, the following discrepancies are noted. Remedial options should be adjusted, as necessary, to reflect consideration of these risks.

Contrary to the discussion on pages ES-3 and 2-30, at Site 6, unacceptable risks were predicted for current adult trespassers (HI = 6.0), current adolescent trespassers (HI = 8.1) and future adult commercial workers (HI = 1.3).

It doesn't appear that risks were estimated for future adult or adolescent recreational users at Site 7. Please correct pages ES-4 and 2-31 to reflect this.

According to page ES-4, no unacceptable risks were calculated for current adolescent trespassers at Site 7. However, Table 2-2 indicates an HI of 1.4 for these receptors.

Risks to future adult and adolescent recreational users at Site 7 are described twice in the first paragraph of page ES-4.

Future residential risks described in Section 2.8.2.1 do not correspond to the results presented in Table 2-3.

Page 2-31 refers to Table 2-4 as "a summary of chemicals and corresponding human health risks." However, Table 2-4 provides a list of receptors and associated HQs only.

Contrary to page 3-3, unacceptable risks to future on-site residents (HI = 6.8) and current adolescent trespassers (HI = 1.4) were predicted in the BLRA for Site 7.

The commercial remediation goal proposed on page 3-10 for 1,1,1-trichloroethane (70,500 mg/kg) seems high. (The generic RBC for this compound in soil is 41,000 mg/kg.) Please check this value.

In addition to the RAOs listed in Section 3.6, shouldn't protection of gw (from a contaminated soil source) be considered? If so, soil remediation goals protective of soil-to-gw transfer should be presented in the FS.

The FS report needs to be revised to include a discussion regarding the handling of contaminated gw.

Table 2-4 seems to be mis-titled.

A table of carcinogenic risks corresponding to Table 3-1 should be included.

Proposed Plan

On page 9, it should be noted that an unacceptable cancer risk (3E-04) was predicted for future on-site residents at Site 6.

Although the PP states that unacceptable risks were demonstrated at Sites 6 and 7 -- and a table listing receptors and pathways evaluated is included -- actual risk values are not provided in the PP. A table of risk estimates (similar to Table 2-2 and 2-3 in the FS) should be included.

On page 9, an explanation should be provided for eliminating gw from remedial consideration.

If current or future gw conditions are a concern, eliminating soil contamination as a source to gw should be listed as a RAO on page 15.

Final remediation goals for Site 6 are presented in Table 4. As mentioned previously, the value proposed for 1,1,1-trichloroethane seems high and should be verified.

In the discussion of remedial alternatives, institutional controls prohibiting residential development should be clearly explained.