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ST JULIENS CREEK  
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U S NAVY RESPONSE TO COMMENTS TO DRAFT RECORD OF DECISION SITE 21  
INDUSTRIAL AREA OPERABLE UNIT (OU) 12 BUILDING 187 ST JULIENS CREEK ANNEX  
CHESAPEAKE VA  
6/23/2011  
CH2M HILL

**Responses to Comments  
Draft Record of Decision  
Site 21: Industrial Area  
EPA Designation: OU-12, Site 21 – Building 187  
St. Juliens Creek Annex  
Chesapeake, Virginia**

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DATE: June 23, 2011

**Comments from NAVFAC Mid-Atlantic, provided 9 June 2011**

1. **Comment:** Page 2-2, Section 2.3, to last sentence: Change “The public comment period for the Proposed Plan was between May 1, 2011 and July 15, 2011.” to “The public comment period for the Proposed Plan presenting the final remedy was between May 1, 2011 and July 15, 2011.”

**Response:** The suggested revision has been made. Additionally, the end of the public comment period has been changed to June 15, 2011 to reflect the correct date.

2. **Comment:** Page 2-2, Section 2.3, to last sentence: Change “The public meeting to present the Proposed Plan was held on May 12, 2011 at the Major Hillard Library.” to “The public meeting to present the final Proposed Plan was held on May 12, 2011, at the Major Hillard Public Library.”

**Response:** The suggested revision has been made.

3. **Comment:** Page 2-2, Section 2-3, last sentence: “The public notice of the meeting and availability of documents was placed in the Virginian-Pilot newspaper on May 1, 2011.” to “The public notice announcing the meeting and availability of documents was placed in the Virginian-Pilot newspaper on May 1, 2011.”

**Response:** The suggested revision has been made.

4. **Comment:** Page 2-5, Table 1: Should the final Proposed Plan be after the RI and FS Addendum?

**Response:** The Proposed Plan has been added to Table 1.

5. **Comment:** Page 2-6, Section 2.4: Please add a summary of all sites that were incorporated into Site 21. Site 11 groundwater was rolled into Site 21

groundwater. Sites 9, 10, 11, 18, and 21 soils were declared NFA. Sites 9 & 10 groundwater was declared NFA.

**Response:** The last sentence of Section 2.4 had been replaced with, "This ROD documents the final remedy for Site 21 (including Sites 10, 11, and 18, which were incorporated into Site 21 within the SSA) and does not include the other sites at the facility."

6. **Comment:** Page 2-23, Section 2.11.3 & Page 2-24, Table 7: Summary estimated remedy costs are the same as for the Interim ROD and derived from the FS estimates. The final remedy includes additional O&M tasks (vapor intrusion monitoring until RAOs are met) that would significantly increase the O&M costs. For the basis of a present value evaluation, NORM estimates \$9K-\$21K per event for the VI monitoring. 35 events for 30 years (semiannual in years 1-5 and annual in years 6-30). Also it seems that the 5-year review costs were left out. For the basis of a present value evaluation, this could be assumed to be \$17K-\$36K per event for 6 events over a 30-year period. Ranges above reflect the +50%/-30% range.

**Response:** The cost estimate in Table 7 has been updated as requested. In addition, Tables 5 and 6 have been revised to incorporate the added costs into the other alternatives to prevent confusion in association with the alternative evaluation and the text in Sections 2.9.2 and Section 2.11.3 has been updated. The costs had not previously been updated because the additions fall within the -30% /+50% range.