

N69118.AR.001169
ST JULIENS CREEK
5090.3a

U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
COMMENTS TO DRAFT RECORD OF DECISION SITE 21 INDUSTRIAL AREA OPERABLE
UNIT (OU) 12 BUILDING 187 ST JULIENS CREEK ANNEX CHESAPEAKE VA
6/13/2011
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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PREPARED BY: CH2M HILL

DATE: June 13, 2011

Comments from VDEQ, provided 1 June 2011

1. **Comment:** Figure 6. Consider updating this figure to include the injection locations agreed to in the RD.
Response: Figure 5 and Figure 6 will be revised to remove the conceptual injection layouts and “Conceptual Remedy Layout” will be removed from their figure titles.
2. **Comment:** Figure 6. In order to make the figure more reader-friendly, consider filling in the color of the low concentration treatment areas as was done for the high concentration treatment areas in Figure 6.
Response: The suggested revision has been made.
3. **Comment:** Section 1.6, 5th bullet – change (Section 2.9, Table 7) to either (Section 2.9, Table 5) or (Section 2.11.3, Table 7).
Response: The text has been changed in accordance with the second suggestion.
4. **Comment:** Table 1, RI, last line – extra period.
Response: The extra period has been removed.
5. **Comment:** Table 5 – reformat to fit all of Alternative 3 Details on Page 2-15.
Response: The requested revision has been made.
6. **Comment:** Section 2.9.2, Short-term Effectiveness, second to last line – extra period.
Response: The extra period has been removed.
7. **Comment:** Section 2.9.2, Cost, second to last sentence – change “Alternatives 3” to “Alternative 3”.

Response: The suggested revision has been made.

8. **Comment:** Section 2.11.2, Land Use Controls, first paragraph – explain that the buffer zone is based on vapor intrusion potential.

Response: “To account for the mobility in volatile chemicals in consideration of potential vapor intrusion pathways” has been added to the beginning of the sentence discussing the buffer zone.

9. **Comment:** Section 2.11.4, third sentence – add “to” after “reduced.”

Response: The suggested revision has been made.

10. **Comment:** Section 2.11.5, 5YR Requirements, first sentence – add “the” before “remedial action”.

Response: The suggested revision has been made.

11. **Comment:** Section 2.11.5, 5YR Requirements, last sentence – list the FFA parties.

Response: The suggested revision has been made.

12. **Comment:** References:

- a. references 5-13 – add Table 1 under Location in ROD column
- b. reference 14 – change to Section 2.5.1 and add Table 2 under Location in ROD column
- c. references 15-16 – change to Section 2.5.1 under Location in ROD column
- d. reference 29 – change “capitol” to “capital”
- e. reference 30 – text states “total present values”, please correct

Response:

- a. The suggested revision has been made.
- b. The suggested revision has been made.
- c. The suggested revision has been made.
- d. The suggested revision has been made.
- e. The suggested revision has been made.