

August 31, 2007

Mr. Jeffrey Boylan  
NPL/BRAC  
Federal Facilities Branch (3HS11)  
U.S. EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Subject: Response to comments, *Draft Record of Decision: Site 13 Former Pentachlorophenol Dip Tank and Wash Rack Area*, NAB Little Creek, Virginia Beach, Virginia

Dear Mr. Boylan:

On behalf of the Navy, CH2M HILL has prepared the following responses to comments received from EPA on the *Draft Record of Decision for Site 13, Former Pentachlorophenol Dip Tank and Wash Rack Area* at Naval Amphibious Base Little Creek, Virginia Beach, Virginia:

1. Section 2.10, Comparative Analysis of Alternatives: Please replace state acceptance and community acceptance bullets with the following, which closely follow 40 C.F.R. § 300.430(e)(9)(iii)(H):
  - State Acceptance. Includes the State's position and key concerns related to the preferred alternative and other alternatives in the proposed plan, and State comments on ARARs or proposed ARARs waivers.
  - Community Acceptance. Includes determining which components of the alternatives interested persons in the community support, have reservations about, or oppose.

**Response: The State Acceptance and Community Acceptance bullets were revised accordingly.**

2. Section 2.12.1, Summary of Rationale for the Selected Remedy, 2nd sentence: The statement here seems to differ from what is in Section 2.10.2 Long-Term Effectiveness and Permanence. Please rewrite one or the other so they are consistent. In Section 2.12.1, Alternative 5 is about as effective in the long term as Alternatives 4 and 6. However, in 2.10.2 on page 2-15 at the bottom, Alternatives 4 and 6 “are considered slightly less effective in the long term because they do not target the source zone through treatment and/or do not equally treat PCP and VOCs.” Which is correct? Again, the main goal here is to explain why Alternative 5 is better than the others, listing the main factors that make

Alternative 5 best. Additionally, the current draft of this sentence is a bit awkward when it says “Alternative 5 will achieve RAOs with similar . . . disruption to current land use . . . as Alternatives 4 and 6.”

**Response: The first paragraph of Section 2.12.1 was revised to state “Alternative 5, Enhanced Anaerobic Bioremediation, is expected to effectively achieve RAOs in about the same time (estimated to be < 45 years) as Alternatives 4 and 6 and in less time than Alternatives 1 through 3. Alternative 5 will achieve RAOs with similar ease of implementation and achieves greater long-term effectiveness and permanence than Alternatives 4 and 6 because it will target the source zone through treatment and/or equally treat the VOCs and PCP. Additionally, Alternative 5 will achieve RAOs with lower cost than Alternative 6”.**

3. Section 2.12.2, Description of the Selected Remedy: Before describing the LUCs, possibly state some performance standards for treatment so as to know when the remedy is complete. For example, “The Selected Remedy shall attain, to the maximum extent practicable in a reasonable amount of time, the cleanup levels in Table 2-8 in ground water throughout Site 13 and in any portion of the Site 13 VOC or phenol plume that migrates beyond the boundaries of Site 13.” Is it possible that, in the future, daughter products in the ground water may pose an unacceptable risk or exceed MCLs even though concentrations of the four chemicals listed in Table 2-8 have been reduced to the cleanup levels? This is not critical at the present time. If the four chemical concentrations attain the cleanup levels, but the other daughter products pose unacceptable risk, a minor or significant change to the ROD cleanup levels can be made to be protective.

**Response: The recommended sentence was added to the fifth paragraph of Section 2.12.2. Although, VOC daughter products will be monitored as part of the remedy and will be evaluated as a remedy performance metric.**

4. Section 2.12.3, Summary of the Estimated Remedy Costs: Please add a detailed breakdown of the estimated costs to the ROD, like Highlight 6-29 of the ROD Guidance. Table 2-9 is too brief. For example, add or include something like the following, which is based on Highlight 6-28 of the ROD Guidance; “The information in this cost estimate is based on the best available information regarding the anticipated scope of the Selected Remedy. Changes in the cost estimate are likely to occur as a result of new information and data collected during the remedial design of the Selected Remedy. Major changes will be documented in the form of a memorandum in the Administrative Record file, an explanation of significant differences or a ROD amendment. This is an order-of-magnitude engineering cost estimate that is expected to be within +50 percent to -30 percent of the actual project cost.”

**Response: A new Table was generated based on the Site 13 FS cost estimate to detail the cost of the selected remedy. Section 2.12.3 was revised to state “A complete cost summary for each remedial alternative is provided in Appendix F of the Site 13 FS (CH2M HILL, 2004). The estimated costs for the selected remedy are summarized in Table 2-11. The information in this cost estimate is based on the best available information regarding the anticipated scope of the Selected Remedy. Changes in the cost estimate are likely to occur as a result of new information and data collected during the remedial design of the Selected Remedy. Major changes will be**

**documented in the form of a memorandum in the Administrative Record file, an explanation of significant differences or a ROD amendment. This is an order-of-magnitude engineering cost estimate that is expected to be within +50 percent to -30 percent of the actual project cost”.**

5. Section 2.13.6, Five-Year Review Requirements: Please replace with the language at the end of Highlight 6-37 of the ROD Guidance as follows: “Because this remedy will result in hazardous substances, pollutants, or contaminants remaining on-site above levels that allow for unlimited use and unrestricted exposure, a statutory review will be conducted within five years after initiation of remedial action to ensure that the remedy is, or will be, protective of human health and the environment.”

**Response: Section 2.13.6 was revised accordingly.**

If you have any questions concerning these comments, please give me a call at (757) 671-8311 x46212.

Sincerely,

Jamie Butler,  
Activity Manager

cc: Mr. Paul Herman/VDEQ  
Mr. Scott Park/ NAVFAC Mid Atlantic  
Ms. Cecilia White/ CH2M HILL