

9/7/07-01366

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

Hazardous Site Cleanup Division
Jeffrey M. Boylan
Mail Code: 3HS11

Direct Dial: (215) 814-2094
Fax: (215) 814-3025

September 7, 2007

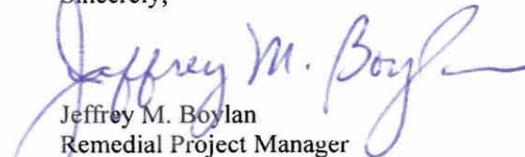
Mr. Scott Park, P.E.
NAVFAC Mid Atlantic
9742 Maryland Ave. Bldg N-26, Rm 3208
Norfolk, VA 23511-3095

Subject: *Draft Final Record of Decision Site 13 Former Public Works Pentachlorophenol Dip Tank and Wash Rack, Naval Amphibious Base Little Creek, Virginia Beach, Virginia, September 2007.*

Dear Mr. Park:

The Environmental Protection Agency Region III (EPA), Office of Federal Facility Remediation and Site Assessment, NPL/BRAC Federal Facilities Branch (3HS11) and the Office of Regional Counsel, Site Remediation Branch #4 (3RC44) have reviewed the redline electronic version of the above subject document, figures, tables, and the associated response to comment letter dated August 31, 2007 received from CH2M HILL via email on behalf of the Navy. Overall, the documents reflect the changes recommended by EPA. However based on EPA's review, the following comments (see enclosure) provided either are supplemental or remain outstanding. In addition, EPA has previously provided comments on the State ARARs table (table 2-13 of the ROD) via separate emails for consideration and inclusion in the final version of the document.

Sincerely,


Jeffrey M. Boylan
Remedial Project Manager
NPL/BRAC Federal Facilities
Branch (3HS11)

Enclosure

cc: NABLC partnering team (electronic copy only)
Frank Fritz, USEPA Region III (electronic copy only)
File

Enclosure

Section/Page/Para	Comment
Contents, Tables	Add an entry for new Table 2-11, Detailed Cost Estimate for the Selected Remedy Renumber Table 2-11 as 2-12 (fed arars) Renumber Table 2-12 as 2-13 (state arars)
1.4 LUCs bullet, 1st line	Please insert space between "2.12.2" and "of"
1.4, LUCs bullet, second sub-bullet	Please insert "residential, " before "child care, elementary or secondary school, or playground facilities"
1.5, 1st sent	Please delete "satisfies the statutory requirements of CERCLA §121 and the regulatory requirements of the NCP, " This is redundant, since the rest of the sentence recites the statutory requirements of 121 and the NCP. Also, this phrase is not part of the standard language in Highlight 6-4 of the ROD Guidance.
1.7 Signatures	On my computer, James Burke's signature block splits over two pages. Please make sure whole signature block appears on a single page
2.1, 3rd to last sentence	Please replace "i.e.Columbia Aquifer" with ", i.e., Columbia Aquifer"
2.2.2, last sent	Please replace "oncluded" with "concluded"
2.2.6, alternative 2	Insert space between "Long Term" and "Monitored"
2.6, 2d to last sent	"to MCLs levels that allow unlimited use" is awkward. I'd delete "MCLs" and change it back to "to levels that allow"
2.8, 2d bullet	Please insert space between "the" and "cleanup levels"
2.9.5, 2d para, last sent	Please insert space between "approximately" and "45"
2.9.7, 5th bullet	Please delete "Uses" before "the same RAOs"
2.10, 1st para, 2d sent	Please delete the last phrase "and will not be discussed further." We'll include that idea in 2.10.1, below.
2.10, State and Community Accept	Please format font consistently w/ rest of document Delete extra bullet between State Acceptance and Community Acceptance
2.10.1, Protection of Human Health and the Environment	As previously suggested, please add sentence at end of paragraph that states: The no action alternative (Alternative 1) does not meet the threshold criterion of protecting human health and the environment and will not be discussed any further.
2.12.2, 5th para, 1st sent ("The Selected Remedy shall attain")	Please format font consistently w/ rest of document
2.12.3, 3rd through last sentences	Please format font consistently w/ rest of document
2.12.4, 1st para, last sent	Insert space between "as" and "treatment"
2.13.6, Five Year Review	Please cut new paragraph about 5 year review from after 2.14 and paste it into correct position following 2.13.6 heading. Format paragraph and font consistently with rest of document.
Table 2-12	Please replace: 144.1G1 with 144.1(g)(1) 144.12a with 144.12(a) 144.24a with 144.24(a) 144.80e with 144.80(e) 146.10c with 146.10(c)