

4/23/04-01127

Response to Comments
Draft Final Proposed Remedial Action Plan
Site 22 – Camp Allen Salvage Yard
Naval Station Norfolk

The Draft Final Proposed Remedial Action Plan (PRAP) for Site 22 – Camp Allen Salvage Yard was submitted for review on December 15, 2003. The following comments were provided by Charles Howland, USEPA Office of Regional Counsel, in an email dated January 23, 2004. The Final PRAP will be revised to incorporate these comments.

1. **Comment:** Section 2.0, 2nd paragraph – Please clarify that the pond is up gradient from the salvage yard.

Response: This paragraph is referring to the U.S. Army Corps of Engineers verification that the pond area is considered upland property versus wetland property.

2. **Comment:** Section 4.1, 1st paragraph – Please provide regulatory citation for this assertion.

Response: A regulatory citation will be added to this paragraph.

3. **Comment:** Section 4.1 – Please provide clarification as to how/why one risk analysis was done on the two different areas of the site? Aren't the exposure pathways and receptors different?

Response: One human health risk assessment was completed for the Camp Allen Salvage Yard that covered both the pond area and the Salvage Yard. This risk assessment included multiple media (surface soil, subsurface soil, groundwater, surface water, and sediment) with varying exposure pathways and receptors.

4. **Comment:** Section 6.0, 3rd paragraph – Please include these tables in the ROD.

Response: This paragraph will be revised to indicate that the ARARs considered in the development of remedial alternatives in the FS were met through the four non-time-critical removal actions completed at the site. A short discussion of ARARs met during the execution of the removal actions will be included in the ROD instead of including Tables 2-1 and 2-2 of the FS.

The third paragraph will be revised to state, “In accordance with CERCLA, only those remedial alternatives that attain or exceed applicable or relevant and appropriate requirements (ARARs) were considered. The purpose of this requirement is to make CERCLA response actions consistent with other pertinent Federal and State environmental requirements. ARARs that were considered during the FS were met during the execution of the four non-time-critical removal actions. As the remedies addressed in this Proposed Plan do not include any additional invasive remedies for soil and sediment, ARARs are not applicable.”

5. **Comment:** Section 7.1, 1st paragraph – Consider adding “and therefore is not further considered in the remainder of the analysis” as it is in Section 7.2 for sediment.

Response: This statement will be deleted from the discussion of sediment in Section 7.2 and will not be included in Section 7.1.

6. **Comment:** Section 7.1, 4th paragraph – ARARs apply to removal actions “to the extent practicable.” And in any event, is this a reference to the previously performed removal? It would appear that there simply are no ARARs here. Could the Endangered Species Act, Migratory Bird Treaty Act, and the VA Endangered Plant and Insect Species Act be considered location specific ARARs? Also, what about chemical-specific ARARs?

Response: There are no ARARs applicable to the site as ARARs were evaluated during the FS and were considered during the four non-time-critical removal actions. Since this PRAP doesn’t consider any removal action-type remedies, ARARs are not applicable. Therefore, there are no location-, chemical-, or action-specific ARARs associated with the soil or sediment alternatives.

7. **Comment:** Section 7.2, 2nd paragraph – Could the Endangered Species Act, Migratory Bird Treaty Act, and the VA Endangered Plant and Insect Species Act be considered location specific ARARs? What about chemical-specific ARARs?

Response: See response to comment #6.

8. **Comment:** Section 8.0, 2nd paragraph – Delete “...over the other alternative.” There is no decision being made here, against the “no action” alternative.

Response: The sentence will be revised to delete “over the other alternative.”