

3/10/06-01262

Reisch, Timothy A CIV NAVFAC MID ATLANTIC

From: Parsons, Rymn CIV NAVFACENG 09CC
Sent: Friday, March 10, 2006 3:37 PM
To: Reisch, Timothy A CIV NAVFAC Lant
Subject: FW: EPA comments on NNSY, Site 17, ROD
Signed By: Verifying the signature. Click the icon for details.

Attachments: NNSY Site 17 ROD_020106--orc com.doc



NNSY Site 17
OD_020106--orc c.

Forwarded. Please pass it on to Paul. Would like to review your comments before we reply to EPA. I have to away from 13 to 24 Mar. See you when I get back. R/Rymn

-----Original Message-----

From: Parent.Suzanne@epamail.epa.gov [mailto:Parent.Suzanne@epamail.epa.gov]

Sent: Friday, March 10, 2006 15:32
To: Parsons, Rymn CIV NAVFACENG 09CC
Cc: Franklin.Greyson@epamail.epa.gov
Subject: EPA comments on NNSY, Site 17, ROD

Hi Rymn--

Attached are our comments on the ROD. Our RPM Greyson tells me that it needs to go to Tim Reisch and Paul Landin at CH2MHILL (plandin@CH2M.com):

--Suzanne

(See attached file: NNSY Site 17 ROD_020106--orc com.doc)

NNSY Site 17 ROD_020106--orc com

Main document changes and comments		
Page iii: Inserted 2-5	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Deleted 2-5	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Inserted 2-5	Sparent	3/8/2006 10:29:00 AM
Page iii: Deleted 2-6	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Inserted 2-8	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Deleted 2-7	timothy.reisch	3/17/2006 7:10:00 AM
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Page iii: Inserted 2-14	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Deleted 2-13	timothy.reisch	3/17/2006 7:10:00 AM
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Page iii: Deleted 2-14	timothy.reisch	3/17/2006 7:10:00 AM
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Page iii: Deleted 2-15	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Inserted 2-17	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Deleted 2-17	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Inserted 2-17	Sparent	3/8/2006 10:29:00 AM
Page iii: Deleted 2-16	timothy.reisch	3/17/2006 7:10:00 AM

Page iii: Inserted 2-18	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Deleted 2-18	timothy.reisch	3/17/2006 7:10:00 AM
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Page iii: Deleted 2-17	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Inserted 2-18	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Deleted 2-18	timothy.reisch	3/17/2006 7:10:00 AM
Page iii: Inserted 2-18	Sparent	3/8/2006 10:29:00 AM
Page iii: Deleted 2-17	timothy.reisch	3/17/2006 7:10:00 AM
Page 1-1: Deleted	Unknown	
Page 1-1: Inserted	Sparent	3/1/2006 10:41:00 AM
Page 1-1: Deleted #	Suzanne	2/27/2006 10:02:00 AM
Page 1-1: Deleted eliminating	Sparent	3/1/2006 10:39:00 AM
Page 1-1: Inserted restricting	Sparent	3/1/2006 10:39:00 AM
Page 1-1: Deleted to future residential receptors	Sparent	3/1/2006 10:38:00 AM
Page 1-1: Deleted their	Sparent	3/1/2006 10:40:00 AM
Page 1-1: Inserted or	Suzanne	2/27/2006 10:35:00 AM
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Page 1-1: Inserted facilities	Suzanne	2/27/2006 10:35:00 AM
Page 1-1: Deleted	Suzanne	2/27/2006 10:36:00 AM

facilitie

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in effect

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conditions are assessed to allow

Page 1-1: Deleted Suzanne 2/27/2006 10:37:00 AM
may be redeveloped for residential land use, allowing

Page 1-1: Comment [S1] Suzanne 3/8/2006 10:49:00 AM
Unrestricted use/unlimited exposure isn't restricted to residential use only. Also, my understanding is that risk in the residential use scenario is presumed, not quantified. So HHRA would have to be performed before LUCs could be discontinued.

Page 1-1: Inserted Suzanne 2/27/2006 10:44:00 AM
the remedy

Page 1-1: Deleted Suzanne 2/27/2006 10:44:00 AM
LUCs

Page 1-1: Inserted Suzanne 2/27/2006 10:44:00 AM
/

Page 1-1: Comment [S2] Suzanne 3/8/2006 10:49:00 AM

A semi-colon is used to separate two independent clauses or to separate a series when one or more of the elements of the series itself includes a comma (the "strong comma" use of semicolon). Neither situation is presented in this sentence.

Page 1-1: Deleted Suzanne 2/27/2006 10:44:00 AM
;

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;

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/

Page 1-1: Inserted Suzanne 2/27/2006 10:45:00 AM
/

Page 1-1: Deleted Suzanne 2/27/2006 10:45:00 AM
and

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Page 1-1: Deleted Suzanne 2/27/2006 10:45:00 AM
;

Page 1-1: Comment [S3] Suzanne 3/8/2006 10:49:00 AM

Do you have to use the acronym CIA? RODs are public documents. CIA means something different to most people. If it's a very commonly used acronym at NNSY (everyone knows what it means and refers to that area solely as the "CIA") and every figure uses "the CIA" to denote that location, then I guess okay. Otherwise, I really recommend just using the words and no acronym.

Page 1-1: Inserted Suzanne 2/27/2006 10:48:00 AM

,

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,

Page 1-1: Inserted Suzanne 2/27/2006 10:48:00 AM

with contaminants

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is

Page 1-1: Inserted Suzanne 2/27/2006 10:48:00 AM

are

Page 1-1: Deleted Suzanne 2/27/2006 10:48:00 AM

,

Page 1-1: Inserted Suzanne 2/27/2006 10:49:00 AM

Page 1-1: Inserted Suzanne 2/27/2006 10:49:00 AM

, and every 5 years thereafter for as long as the remedy remains in effect,

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#

Page 2-1: Comment [S4] Suzanne 3/8/2006 10:49:00 AM

Redundant. # means no.

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c

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C

Page 2-1: Comment [S5] Suzanne 3/8/2006 10:49:00 AM

Unclear. Building 195 *houses* (?) a newer building addition?? A building inside a building?

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S

Page 2-1: Comment [S6] Suzanne 3/8/2006 10:49:00 AM

Redundant. "Potential" and "may" mean the same idea.

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Potential s

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Page 2-1: Inserted Suzanne 2/27/2006 1:54:00 PM

use in the

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ROD

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Proposed Plan

Page 2-1: Deleted Suzanne 2/27/2006 1:59:00 PM

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ed

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ng

Page 2-1: Deleted Suzanne 2/27/2006 1:59:00 PM

further

Page 2-1: Deleted Suzanne 2/27/2006 1:59:00 PM

been recorded

Page 2-1: Inserted Suzanne 2/27/2006 1:59:00 PM

occurred

Page 2-1: Inserted Suzanne 2/27/2006 2:02:00 PM

Page 2-1: Inserted Suzanne 2/27/2006 2:02:00 PM

Page 2-1: Inserted Suzanne 2/27/2006 2:02:00 PM

Page 2-1: Inserted Suzanne 2/27/2006 2:04:00 PM
irginia

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A

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previous

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s

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ve

Page 2-1: Inserted Suzanne 2/27/2006 2:08:00 PM
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Page 2-1: Inserted Suzanne 2/27/2006 2:09:00 PM
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Page 2-1: Inserted Suzanne 2/27/2006 2:10:00 PM
; five IRP sites are still under investigation

Page 2-1: Comment [57] Suzanne 3/8/2006 10:49:00 AM
Is this correct? If not, explain what's going on with the other five sites.

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2

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two

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S

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s

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s

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a

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A

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conditions at

Page 2-1: Deleted Suzanne 2/27/2006 2:15:00 PM

may be redeveloped for residential land use that

Page 2-1: Deleted Suzanne 2/27/2006 2:15:00 PM

s

Page 2-1: Inserted Suzanne 2/27/2006 2:21:00 PM

the remedy

Page 2-1: Deleted Suzanne 2/27/2006 2:21:00 PM

LUCs

Page 2-1: Deleted Suzanne 2/27/2006 2:21:00 PM

be allowed

Page 2-1: Inserted Suzanne 2/27/2006 2:21:00 PM

occur

Page 2-1: Deleted Suzanne 2/27/2006 2:21:00 PM

on

Page 2-1: Inserted Suzanne 2/27/2006 2:21:00 PM

at

Page 2-1: Inserted Sparent 3/10/2006 3:06:00 PM

, completely within the CIA

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-

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Page 2-1: Inserted Suzanne 2/27/2006 2:28:00 PM

, which discharges into the Southern Branch of the Elizabeth River

Page 2-1: Comment [S8] Suzanne 3/8/2006 10:49:00 AM

Right?

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Page 2-1: Comment [S9]	Suzanne	3/8/2006 10:49:00 AM
What's the logic of bolding the table references but not the figure references??		
Page 2-1: Comment [S10]	Suzanne	3/8/2006 10:49:00 AM
Please change to either chemicals of concern (COCs) or chemicals of potential concern (COPCs), whichever is correct.		
Page 2-1: Comment [S11]	Suzanne	3/8/2006 10:49:00 AM
Correct? Shouldn't this be written the opposite way? Site concentrations don't exceed MCLs. Pls. check.		
Page 2-1: Comment [S12]	Suzanne	3/8/2006 10:49:00 AM
How are soils 8 inches bgs categorized? Adjust definitions to include soils between 6 and 12 inches. Were no samples taken at that depth?		
Page 2-1: Comment [S13]	Suzanne	3/8/2006 10:49:00 AM
The max concentrations will mean nothing to the reader without a corresponding action level of some sort. I recommend putting the numerical information into a table that also includes a column for RBCs.		
Page 2-1: Comment [S14]	Suzanne	3/8/2006 10:49:00 AM
Will mean nothing to the reader. Hex chromium is more toxic than most other chromium, isn't it?		
Page 2-1: Inserted	Sparent	3/10/2006 3:09:00 PM
, allowed access to the CIA,		
Page 2-1: Inserted	Sparent	3/10/2006 3:10:00 PM
and access to the site will remain restricted		
Page 2-1: Inserted	Suzanne	2/27/2006 2:52:00 PM
contaminant		
Page 2-1: Deleted	Suzanne	2/27/2006 2:52:00 PM
soil		
Page 2-1: Inserted	Suzanne	2/27/2006 2:53:00 PM
and unlimited exposure		
Page 2-1: Inserted	Suzanne	2/27/2006 2:53:00 PM
other remedial		
Page 2-1: Deleted	Suzanne	2/27/2006 2:53:00 PM
additional		
Page 2-1: Inserted	Suzanne	2/27/2006 2:54:00 PM
under CERCLA		
Page 2-1: Inserted	Suzanne	2/27/2006 2:54:00 PM
at		

Page 2-1: Deleted Suzanne 2/27/2006 2:54:00 PM

e

Page 2-1: Deleted Suzanne 2/27/2006 2:54:00 PM

is

Page 2-1: Inserted Suzanne 2/27/2006 2:54:00 PM

conditions are sufficiently

Page 2-1: Inserted Suzanne 2/27/2006 2:55:00 PM

to allow

Page 2-1: Inserted Suzanne 2/27/2006 2:55:00 PM

and unlimited exposure

Page 2-1: Inserted Suzanne 2/27/2006 2:56:00 PM

immediately

Page 2-1: Comment [S15] Suzanne 3/8/2006 10:49:00 AM

Is this correct? If not, then I don't understand the logic of the sentence after "therefore."

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it

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,

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levels

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not un

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Page 2-1: Inserted Sparent 3/1/2006 11:26:00 AM

November

Page 2-1: Deleted Sparent 3/1/2006 11:26:00 AM

December

Page 2-1: Inserted Suzanne 2/27/2006 3:11:00 PM
not un

Page 2-1: Comment [516] Suzanne 3/8/2006 10:49:00 AM

References used in the previous page include a comma after the author and before the year. Choose a format (comma or no comma) and make consistent throughout document.

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Page 2-1: Deleted Sparent 3/1/2006 10:46:00 AM
assessment

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s

Page 2-1: Inserted Sparent 3/1/2006 10:47:00 AM

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that

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which

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Page 2-1: Deleted Sparent 3/1/2006 10:50:00 AM
a 1 in 1,000,000

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one

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in a million

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n

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Page 2-1: Deleted Sparent 3/1/2006 11:01:00 AM
soil

Page 2-1: Deleted Sparent 3/1/2006 11:01:00 AM

Page 2-1: Formatted Sparent 3/1/2006 11:02:00 AM
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exposed to soil

Page 2-1: Inserted Sparent 3/1/2006 11:28:00 AM
across all media

Page 2-1: Comment [SP17] Sparent 3/8/2006 10:49:00 AM
Acc. to Table 5, the HI of 0.60 is for all media, not just soil. Is that right?

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;

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Page 2-1: Inserted Sparent 3/1/2006 1:59:00 PM
findings

Page 2-1: Deleted Sparent 3/1/2006 1:58:00 PM
lines of evidence

Page 2-1: Inserted Sparent 3/1/2006 1:58:00 PM

Page 2-1: Inserted Sparent 3/1/2006 1:58:00 PM

Page 2-1: Comment [SP18] Sparent 3/8/2006 10:49:00 AM
These findings seem to argue AGAINST the determination that the groundwater poses acceptable risk.

Page 2-1: Deleted Sparent 3/1/2006 2:01:00 PM
(UCL)

Page 2-1: Deleted Sparent 3/1/2006 2:02:00 PM

Page 2-1: Inserted Sparent 3/1/2006 2:02:00 PM
, which is

Page 2-1: Inserted Sparent 3/1/2006 2:01:00 PM

Page 2-1: Inserted Sparent 3/1/2006 2:02:00 PM

Page 2-1: Deleted Sparent 3/1/2006 2:08:00 PM
1, which is

Page 2-1: Comment [SP19] Sparent 3/8/2006 10:49:00 AM
What does this mean? 1 what? Is there a unit? I've reworded to avoid explaining how adherence factors are determined. Is this okay as edited? If not, explain this "1" business.

Page 2-1: Inserted Sparent 3/1/2006 2:08:00 PM
;

Page 2-1: Deleted Sparent 3/1/2006 2:08:00 PM
and

Page 2-1: Deleted Sparent 3/1/2006 2:08:00 PM
will most

Page 2-1: Inserted Sparent 3/1/2006 2:08:00 PM
have

Page 2-1: Inserted Sparent 3/1/2006 2:08:00 PM
ed

Page 2-1: Inserted Sparent 3/1/2006 2:15:00 PM
the

Page 2-1: Inserted Sparent 3/1/2006 2:15:00 PM
or unrestricted access to the site

Page 2-1: Deleted Sparent 3/1/2006 2:19:00 PM
remediation goals

Page 2-1: Inserted Sparent 3/1/2006 2:19:00 PM
RAO

Page 2-1: Comment [SP20] Sparent 3/8/2006 10:49:00 AM
Section 2.8 indicates that there are no remediation goals b/c remediation is unnecessary.

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unrestricted access to the site and to prohibit

Page 2-1: Inserted Sparent 3/1/2006 2:23:00 PM
site conditions are quantitatively assessed for purposes of all potential receptors and any

Page 2-1: Inserted Sparent 3/1/2006 2:25:00 PM
necessary under CERCLA

Page 2-1: Deleted Sparent 3/1/2006 2:26:00 PM
that

Page 2-1: Inserted Sparent 3/1/2006 2:26:00 PM
to remediate the site to

Page 2-1: Inserted Sparent 3/1/2006 2:26:00 PM
n

Page 2-1: Inserted Sparent 3/1/2006 2:27:00 PM
continued protection from

Page 2-1: Deleted Sparent 3/1/2006 2:27:00 PM
that

Page 2-1: Deleted Sparent 3/1/2006 2:27:00 PM
will not be allowed on the site

Page 2-1: Inserted Sparent 3/1/2006 2:48:00 PM
,

Page 2-1: Deleted Sparent 3/1/2006 2:48:00 PM
and

Page 2-1: Inserted Sparent 3/1/2006 2:56:00 PM
Both alternatives do not address remediation of the site soil and subsurface soil;
however, Alternative 2 protects against exposure to soil contaminants by restricting
access to the site while Alternative 1 provides no protection to receptors.

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Body Text

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There are no common elements and distinguishing features of the No Action Alternative
and the LUC Alternative.

Page 2-1: Change timothy.reisch 1/4/2006 10:15:00 AM
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Page 2-1: Inserted Sparent 3/3/2006 9:29:00 AM
The

Page 2-1: Deleted Sparent 3/3/2006 9:29:00 AM
The

Page 2-1: Inserted Sparent 3/3/2006 9:32:00 AM
during the FFS

Page 2-1: Deleted Sparent 3/3/2006 9:32:00 AM
the

Page 2-1: Deleted Sparent 3/3/2006 9:32:00 AM
listed below

Page 2-1: Inserted **Sparent** **3/3/2006 9:24:00 AM**
, as required by the NCP at 40 CFR Section 430 (e)(9)

Page 2-1: Inserted **Sparent** **3/3/2006 9:32:00 AM**
The evaluation is summarized below. The evaluation determined that

Page 2-1: Deleted **Sparent** **3/3/2006 10:38:00 AM**
does not achieve RAOs. The Site 17 FFS provides a more detailed comparative analysis of alternatives

Page 2-1: Inserted **Sparent** **3/3/2006 10:39:00 AM**
is inadequate because it will not achieve the RAOs and performs far worse than Alternative 2 against the nine criteria..

Page 2-1: Deleted **Sparent** **3/3/2006 9:33:00 AM**

Page 2-1: Comment [SP21] **Sparent** **3/8/2006 10:49:00 AM**
I see that this entire section was lifted from the ROD guidance. I am editing for consistent copy edit style within this document.

Page 2-1: Inserted **Sparent** **3/3/2006 9:41:00 AM**
the

Page 2-1: Inserted **Sparent** **3/3/2006 9:41:00 AM**
at 40 CFR Section

Page 2-1: Deleted **Sparent** **3/3/2006 9:41:00 AM**
§

Page 2-1: Deleted **Sparent** **3/3/2006 9:43:00 AM**
which are collectively referred to as "ARARs

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"

Page 2-1: Inserted **Sparent** **3/3/2006 9:43:00 AM**
Section

Page 2-1: Deleted **Sparent** **3/3/2006 9:43:00 AM**
§

Page 2-1: Deleted **Sparent** **3/3/2006 11:12:00 AM**
continues to prohibit unacceptable exposure

Page 2-1: Inserted **Sparent** **3/3/2006 11:12:00 AM**
remains consistent with the LUC objectives

Page 2-1: Deleted **Sparent** **3/3/2006 11:15:00 AM**
is

Page 2-1: Inserted Sparent 3/3/2006 11:15:00 AM
would

Page 2-1: Deleted Sparent 3/3/2006 11:15:00 AM
necessarily protective

Page 2-1: Inserted Sparent 3/3/2006 11:15:00 AM
guarantee protection

Page 2-1: Deleted Sparent 3/3/2006 11:15:00 AM

Page 2-1: Deleted Sparent 3/3/2006 11:16:00 AM
and does not reduce risk given

Page 2-1: Inserted Sparent 3/3/2006 11:16:00 AM
because

Page 2-1: Deleted Sparent 3/3/2006 11:16:00 AM
unrestricted

Page 2-1: Inserted Sparent 3/3/2006 11:16:00 AM
and site access would not be restricted,

Page 2-1: Deleted Sparent 3/3/2006 11:16:00 AM
and

Page 2-1: Inserted Sparent 3/3/2006 11:16:00 AM
resulting in

Page 2-1: Deleted Sparent 3/3/2006 11:17:00 AM
residential

Page 2-1: Deleted Sparent 3/3/2006 11:17:00 AM

Applicable or Relevant and Appropriate Requirements (

Page 2-1: Deleted Sparent 3/3/2006 11:17:00 AM

)

Page 2-1: Inserted Sparent 3/3/2006 11:17:00 AM

s

Page 2-1: Deleted Sparent 3/3/2006 11:18:00 AM
that were considered for

Page 2-1: Inserted Sparent 3/3/2006 11:18:00 AM
applicable to the remedy in

Page 2-1: Inserted Sparent 3/3/2006 11:18:00 AM

This ROD does not waive any ARARs for this remedy.

Page 2-1: Comment [SP22]	Sparent	3/8/2006 10:49:00 AM
I assume no waivers? If a waiver is proposed, it must be included in this ROD and justified here. Pls. let me know if there's a waiver.		
Page 2-1: Inserted	Sparent	3/3/2006 11:20:00 AM
land		
Page 2-1: Inserted	Sparent	3/3/2006 11:20:00 AM
/		
Page 2-1: Inserted	Sparent	3/3/2006 11:20:00 AM
over time		
Page 2-1: Inserted	Sparent	3/3/2006 11:21:00 AM
Although Alternative 2 will not remediate the site and will result in a residual risk remaining at the site,		
Page 2-1: Inserted	Sparent	3/3/2006 11:22:00 AM
which will achieve		
Page 2-1: Deleted	Sparent	3/3/2006 11:22:00 AM
meeting		
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Alternative 2 would reduce residential exposure to soil; Alternative 1 would not reduce exposure		
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Not relevant to this criterion.		
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Both alternatives will be effective in the short-term because Site 17 is located completely within the CIA, access to which is extremely restricted. Otherwise, neither alternative poses any		
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would not be of concern during the implementation of either alternative. N		
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because n

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No action would be implemented under Alternative 1. For Alternative 2, the Navy has proven capability to restrict access to specific areas within the installation and to conduct periodic monitoring of the facility. Alternative 2 is easily implemented by the Navy.

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Implementability is not an issue of concern for either alternative.

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by letter included in the Administrative Record

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I assume that there's a letter from the state that can be put into the AR?

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the

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If the comment period isn't over yet, please highlight this sentence too so it can be checked for accuracy before the ROD is finalized.

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LUCs are the selected remedy for Site 17 to protect humans from exposure to soil or subsurface soil in a future residential scenario.

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residential risk is assumed

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the area is currently industrial and is intended to remain industrial use only

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Therefore, t

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No action would not protect against the risk of future residential exposure.

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objectives of the

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are to prohibit unrestricted access to Site 17 and

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will be implemented by the Navy

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The Navy will delineate Site 17 on the GIS map of the installation with a notation regarding the soil contamination and the LUCs required by this ROD. The remedy will also restrict access to Site 17 by unauthorized personnel and unaccompanied children or trespassers.

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under CERCLA

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to ensure that the concentrations of hazardous substances in the soil are at levels to

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that

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occur

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be allowed

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and

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Is there any plan that implementation of the LUCs may, one day, be transferred to another entity, perhaps a contractor?

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Is this total right? $\$1,000 \times 30 \text{ y} = \30K ; $\$5\text{K} \times 6 = \30K . Minus $\$6000$ because the annual inspection would be undertaken concurrent with the 5-y review. Thus, $\$30\text{K} + \$30\text{K} - \$6\text{K} = \54K . NPW is $\$38\text{K}$?

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These are the only actions? What about delineation of the location on GIS map of the installation? Free? And enforcement of the restricted access? Subsumed into other restrictions of access?

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accordance with the

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considered

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and provides the best balance of tradeoffs in terms of the balancing criteria while also considering the statutory preference for treatment as a principal element and bias against offsite treatment and disposal, and state and community acceptance

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, every 5 years thereafter,

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and the environment

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CERCLA section 121 (c) requires 5-year reviews for as long as contaminants remain at the site, and requires that the review assess protection of human health and the environment. Although the contaminants at the site do not pose a risk to the environment currently, each review will have to assess whether the remedy continues to be protective of human health AND the environment.

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CH2M HILL. 2005. *Human Health Risk Assessment Summary Site 17, Building 195 and Vicinity, Norfolk Naval Shipyard, Portsmouth, Virginia*. Prepared for the Department of the Navy, Naval Facilities Engineering Command, Atlantic Division, Norfolk, Virginia. November 2005.

Page 4-1: Comment [SP30] Sparent 3/8/2006 10:52:00 AM

Please check. I presumed that this document was prepared under the same contract as the 2002 document immediately below. I understand that this document is a memo included in the FFS, which is cited above. I include it here as a stand-alone document because it is specifically cited in the ROD. If you have concerns about the public being able to find the document, you could add "(Appended to Baker 2006.)" at the end of the citation.

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Are there slashes in the document numbers on the cover of this document and the two citations immediately following? The references list at the back of the ROD guidance has no slashes, and hyphens between the numbers. The correct citation would be to use what's on the cover of the actual document.

Header and footer changes

Text Box changes

Header and footer text box changes

Footnote changes

Endnote changes