

N69118.PF.001131
ST JULIENS CREEK
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U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
COMMENTS REGARDING DRAFT FIVE YEAR REVIEW REPORT FOR ST JULIENS CREEK
ANNEX CHESAPEAKE VA
01/20/2010
CH2M HILL

**Responses to Comments
Draft Five Year Review Report
St. Juliens Creek Annex
Chesapeake, VA**

PREPARED FOR: Walt Bell, NAVFAC Mid-Atlantic
Karen Doran, VDEQ
Robert Stroud, EPA Region III

PREPARED BY: CH2M HILL

DATE: January 20, 2010

**Comments from VDEQ, provided 04 January 10.
RPM Comments**

1. *Comment: Signature page, first line - add a period after "St"*
Response: The requested revision will be made.
2. *Comment: Executive Summary, first paragraph, first sentence - insert a space between "Section" and "121(c)"*
Response: The requested revision will be made.
3. *Comment: Section 1, fourth paragraph, first sentence - delete "(Site 4)" after "Site 4 - Landfill D"*
Response: The requested revision will be made.
4. *Comment: Section 1, fourth paragraph, last sentence - change "in" to "on"*
Response: The requested revision will be made.
5. *Comment: Table 1-1, correct the spelling of "submitted" in the comments section for Site 2*
Response: The requested revision will be made.
6. *Comment: Table 1-1 - delete the space after "2004" in the documentation of closure cell for Site 4*
Response: The requested revision will be made.
7. *Comment: Section 2.1, fourth paragraph, last sentence - add a period after "St"*
Response: The requested revision will be made.

8. **Comment:** Section 3.3.2, fifth bullet and second paragraph, second sentence - Are these wetlands (NNSY Site 9) successful? Is there monitoring documentation?

Response: A compensatory mitigation plan for the wetland impacts at Site 4 (JV I, July 2005) was submitted and the approach was approved by the USACE. The plan did not require monitoring of the wetland compensatory mitigation. Although a formal monitoring plan was not implemented, the site is currently a vegetated wetland.

9. **Comment:** Section 3.4.3, second paragraph, last sentence - change "area" to "areas" In Section 3.4.5, first sentence, revise the text for "quarterly voluntary groundwater performance monitoring."

Response: The requested revision will be made.

10. **Comment:** Section 3.4.5, first paragraph, first sentence - change "Quarterly" to "quarterly"

Response: The requested revision will be made.

11. **Comment:** Section 3.6, header - Change "Sites" to "Site"

Response: The requested revision will be made.

12. **Comment:** Appendix A - include the most recent storm event inspection from November 2009

Response: The inspection report will be included in the appendix.

13. **Comment:** Appendix C - Many of the shaded areas on the questionnaires are blacked out and not legible. Please include legible versions on the questionnaires.

Response: The surveys will be rescanned so that all sections are legible.

14. **Comment:** Appendix D, Section 5.1, second paragraph, first sentence - Change "is" to "are"

Response: The requested revision will be made.

15. **Comment:** Appendix D, Section 6, fourth sentence - revise to "However, because the most recent (2006 to 2009) arsenic concentrations detected as SJS04-MW04S are somewhat greater than the historical (1997 to 1999) concentrations it is recommended that groundwater monitoring be included in future Five-Year Reviews until arsenic concentrations are below the MCL to confirm no site release or offsite migration of landfill contaminants has occurred."

Response: The sentence will be revised as follows, "However, because the most recent (2006 to 2009) arsenic concentrations detected at SJS04-MW04S are somewhat greater than the historical (1997 and 1999) concentrations it is

recommended that groundwater monitoring for arsenic be conducted prior to the next Five-Year Review. The site conditions, trends, and path forward will then be re-evaluated in light of the pending Tier II Guidance on Pre-Regulated Landfill Monitoring Management for Federal CERCLA Sites.”