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ST JULIENS CREEK  
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VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY REVIEW AND INCORPORATION  
OF U S NAVY COMMENTS TO RECORD OF DECISION SITE 21 ST JULIENS CREEK  
ANNEX CHESAPEAKE VA  
8/23/2011  
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

**From:** [Doran, Karen \(DEQ\)](#)  
**To:** [Staszak, Janna/VBO](#); [Stroud.Robert@epamail.epa.gov](#); [walt.j.bell@navy.mil](#)  
**Cc:** [Jones, Adrienne/VBO](#); [Hollis, Michelle \(DEQ\)](#)  
**Subject:** SJCA Site 21 ROD ARARs Changes and RTCs - VDEQ response  
**Date:** Tuesday, August 23, 2011 1:00:47 PM

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**Team –**

Michelle Hollis and I have reviewed the response to comments (RTCs) and the additional changes made by NAVFAC legal personnel summarized below. VDEQ agrees that the RTCs and additional changes are acceptable and submits no further comments on the Site 21 ROD.

V/R,  
Karen

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**From:** Janna.Staszak@CH2M.com [mailto:Janna.Staszak@CH2M.com]  
**Sent:** Tuesday, August 23, 2011 10:47 AM  
**To:** Doran, Karen (DEQ); [Stroud.Robert@epamail.epa.gov](#); [walt.j.bell@navy.mil](#)  
**Cc:** [Adrienne.Jones@CH2M.com](#)  
**Subject:** SJCA Site 21 ROD ARARs Changes

Team,

While resolving the VDEQ ARARs comments, NAVFAC legal was also working through ARARs comments on a different Virginia site and noticed a few difference between the two sets. As a result, we reviewed both sets of ARARs and we are proposing a few additional changes. Here is a summary of the proposed changes, and a redlined version of the ARARs incorporating both these changes and the changes from the VDEQ comments are attached:

- Table A-1, Federal Chemical-Specific ARARs: We have reworded the prerequisite to match what is in the Little Creek ROD. The change is not substantive. To the comment, we have added the specific COCs and their MCLs.
- Table A-3, Federal Location-Specific ARARs: In the Comment column for the Migratory Bird Act, we replaced “destroy” with “result in a take of” since more than “destroying” is against the law.
- Table A-5, Federal Action-Specific ARARs: We removed the citation to 24(a) because it is administrative.

Let us know if you have any questions or concerns. We’d also like to get consensus on these changes before or during our August 24 meeting.

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