

N69118.AR.001498
ST JULIENS CREEK
5090.3a

EMAIL REGARDING U S EPA REGION III CONCURRENCE WITH U S NAVY RESPONSES
TO COMMENTS ON THE DRAFT PROPOSED PLAN FOR SITE 5 BURNING GROUNDS EPA
DESIGNATION OPERABLE UNIT 5 (OU 5) AND BLOWS CREEK ST JULIENS CREEK
ANNEX VA
11/3/2015
U S EPA REGION III

From: [Stroud, Robert](#)
To: [Staszak, Janna/VBO](#)
Cc: walt.j.bell@navy.mil; [Jones, Adrienne/VBO](#); karen.doran@deq.virginia.gov
Subject: Re: St J's Creek Site 5 PRAP
Date: Tuesday, November 03, 2015 1:37:10 PM

Janna, EPA concurs with the responses. You can draft the clean copy and schedule the public meeting.

Thanks,

Bob

From: Janna.Staszak@CH2M.com <Janna.Staszak@CH2M.com>
Sent: Tuesday, November 3, 2015 10:16 AM
To: Stroud, Robert
Cc: walt.j.bell@navy.mil; Adrienne.Jones@CH2M.com; karen.doran@deq.virginia.gov
Subject: RE: St J's Creek Site 5 PRAP

Bob, here are responses to the final EPA question and comments:

1) Suzanne Parent: Is this area near or in a wetland? Figure 3 shows quite a bit of wetlands through and near Site 5. Decision documents at other NPL sites have indicated that groundwater is acidic because of the plants. If that's the case here, it would be stronger to add the wetlands as a factor contributing to acidic groundwater.

Response: MW02S is approximately 40 feet and MW03S is approximately 100 feet from the closest wetland area. While it's true that wetlands can contribute to low pH, a strong correlation was not observed in Site 5 data. Therefore, the partnering team decided not to include the wetland as a contributing factor in the Supplemental Remedial Investigation report and subsequent Proposed Plan. No changes are proposed (beyond those previously provided and reviewed).

2) Suzanne Parent: I suggest changing to: "Therefore, cobalt in groundwater is a naturally-occurring substance altered by natural processes (rainfall)."

Response: Concur – change will be made.

3) Ami Antoine: Please request that the Navy add the citation to CERCLA Section 104(a)(3)(A) on page 17, first paragraph, last sentence after "remedial action" and before "and" so that the revised sentence will read as follows: Therefore, the Navy and EPA, in consultation with VADEQ, agree that CERCLA does not provide the authority to take remedial action pursuant to CERCLA Section 104(a)(3)(A) and no further action is warranted to address these constituents in shallow aquifer groundwater at Site 5.

Response: Concur – change will be made.

Please let us know if these responses address the remaining EPA concerns. If so, we'll create a clean Proposed Plan and schedule the public review period and public meeting.

Thanks for working through this with us!

Janna Staszak, PE*

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From: Stroud, Robert [mailto:Stroud.Robert@epa.gov]

Sent: Thursday, October 29, 2015 2:36 PM

To: Jones, Adrienne/VBO <Adrienne.Jones@CH2M.com>; Staszak, Janna/VBO <Janna.Staszak@CH2M.com>; karen.doran@deq.virginia.gov; krista.parra@navy.mil

Cc: Bell, Walter J CIV NAVFAC MIDLANT, EV <walt.j.bell@navy.mil>

Subject: Fw: St J's Creek Site 5 PRAP

Walt please check the email string below. This language needs to be incorporated into the document and we will be done. Please let me know if anyone has any questions.

Thanks,

Bob

From: Antoine, Ami
Sent: Thursday, October 29, 2015 2:28 PM
To: Stroud, Robert
Subject: FW: St J's Creek Site 5 PRAP

Bob:

The comments from ORC have been incorporated into the version of the PRAP that you provided to me via email on 9/14/2015 and the revised file is included as an attachment to this message.. ORC doesn't have the PDF software which permits changes directly on PDF files so the comments from Suzanne will appear as "comment bubbles".

Also, please request that the Navy add the citation to CERCLA Section 104(a)(3)(A) on page 17, first paragraph, last sentence after "remedial action" and before "and" so that the revised sentence will read as follows:

Therefore, the Navy and EPA, in consultation with VADEQ, agree that CERCLA does not provide the authority to take remedial action pursuant to CERCLA Section 104(a)(3)(A) and no further action is warranted to address these constituents in shallow aquifer groundwater at Site 5.

Congratulations on getting this finalized.

From: Parent, Suzanne
Sent: Wednesday, October 28, 2015 3:30 PM
To: Antoine, Ami <Antoine.Ami@epa.gov>
Subject: RE: St J's Creek Site 5 PRAP

Hi Ami

I only reviewed pages 14 -18. I haven't checked changes other than on those pages, since I expect that you've already done the checkback.

I added a couple of bubble comments, including the point about wetlands contributing to acidic conditions in groundwater and a suggested sentence change. I think that the changes made by the Navy are good and in keeping with our telemeeting a few months back.

I labeled the document as "EPA legal" as they did for navy legal. If you have any other changes, just drop them on, and then I think it's ready to go back to the Navy via Bob S. I didn't add a reference to CERCLA Section 104(a)(3)(A), but it will be required for the ROD, since it will be one of the bases for the remedial decision. Do you think we should suggest adding it here in the PRAP?
