

N69118.AR.001660
ST JULIENS CREEK
5090.3a

EMAIL AND THE U S EPA REGION III COMMENTS ON THE DRAFT RECORD OF DECISION
SITE 5 BURNING GROUNDS AND BLOWS CREEK USEPA DESIGNATION OPERABLE UNIT
5 (OU 5) ST JULIENS CREEK ANNEX VA
03/11/2016
U S EPA REGION III PHILADELPHIA PA

From: [Stroud, Robert](#)
To: walt.j.bell@navy.mil; [Jones, Adrienne/VBO](#); [Staszak, Janna/VBO](#); karen.doran@deq.virginia.gov; krista.parra@navy.mil
Subject: Fw: SJCA Site 5 & Blows Creek ROD
Date: Friday, March 11, 2016 3:13:14 PM

ROD comments. I apologize for the delay.

Thanks,

Bob

EPA thought this ROD was pretty cleanly written and documents the CERCLA naturally occurring substances exclusion well. Their's one concern, and several minor comments.

Concern—

Section 2.8, 4th sentence is a problem. (“Site conditions allow for unlimited use and unrestricted exposure.”) The groundwater conditions do pose an unacceptable risk, but CERCLA provides no authority to address the unacceptable risk, so the sentence isn’t accurate. To fix the problem, I recommend that the sentence simply be deleted and, in the next sentence, add “under CERCLA” after “any land use are necessary”

A couple of comments--

1. Section 1.3, last sentence of first paragraph—add “under CERCLA” after “Consequently, NFA”
 2. Signature line for Karen Melvin—add “Acting” before “Director”
 3. Section 2.7, Page 2-19, last paragraph. There’s a period missing in the 4th line between “operations” and “Based on these considerations,”
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