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ST JULIENS CREEK
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U S NAVY RESPONSE TO THE VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
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
03/15/2016
CH2M HILL

Responses to Comments
Draft ROD
Site 5 –Burning Grounds (EPA Designation OU-5) and Blows Creek
St. Juliens Creek Annex
Chesapeake, Virginia

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DATE: March 15, 2016

Comments from VDEQ, provided February 2, 2016.

1. **Comment:** *Section 1.5 – Update the name of the EPA director in the signature block.*

Response: The name of the EPA director has been updated to the current acting director as follows, “Karen Melvin, Acting Director”.

2. **Comment:** *Table 1 – The text highlighted using bold blue font for reference is odd. Why not highlight the document in the first column and reference it?*

Response: The bold blue text footnote has been revised to state, “**Bold blue text** identifies detailed site information available in the Administrative Record and listed in numerical order in the References Table located at the back of this document. The References Table includes the specific location in the referenced document where the information can be found.” The references have been checked throughout the document to ensure they are consistently being applied to phrases which direct the reader towards detailed information in each respective report. The reference phrase(s) for line items 1, 6, 7, 8, 12, 19, 25, and 26 in the references section have been revised and a reference for the EE/CA (line item 9 in the references section) has been added. The “Location(s) in ROD” column heading in the References section has been revised to “Location(s) in Referenced Document” and the locations in the column have been revised to the locations in the referenced documents.

3. **Comment:** *Table 1 – The Proposed Plan is not included in the table.*

Response: It is stated in Section 6.3.2 (Site History and Enforcement Activities) of the EPA ROD guidance that the site history and enforcement activities section should provide background information regarding the site investigations and does not explicitly require a comprehensive summary of all site studies, investigations, and activities. The site studies, investigations, and activities included in the table were done so because they provide detailed information that was used to support selection of the remedy for the site, as indicated by the asterisk note in the table. The Proposed Plan does not present detailed information that was used to support selection of the remedy; it presented that information and the selected remedy to the community for their input. The Proposed Plan is

summarized in the Community Participation section of the ROD. Therefore, the Proposed Plan has not been added to the table.

4. **Comment:** *Table 1, 11th row, 3rd paragraph, 2nd bullet - Do we need to add text stating why this is important? i.e. low pH in rainfall, leading to low pH in shallow groundwater/ surface water at the site?*

Response: Per the partnering discussion on February 3, 2016, no revisions have been made.

5. **Comment:** *Table 1, 11th row, 3rd column, 4th bullet – Any need to list the conditions?*

Response: Per the partnering discussion on February 3, 2016, no revisions have been made.

6. **Comment:** *Table 2, 23rd row, 3rd column – Revise the sentence to read, “The Remedial Action Completion Report (RACR), finalized in 2006, documented completion of the RA and demonstrated the achievement of the Remedial Action Objectives.”*

Response: The requested revision has been made.

7. **Comment:** *Table 2, 29th row, 3rd column, 1st sentence –Replace “is” with “was deemed”.*

Response: The requested revision has been made.

8. **Comment:** *Section 2.3, 1st sentence – Is “relations” the correct term or should it be “involvement”?*

Response: The correct term is “involvement”; therefore, “relations” has been changed to “involvement”.

9. **Comment:** *Table 3, 3rd row, 4th column – Make “Decisions” singular.*

Response: The requested revision has been made.

10. **Comment:** *Table 3, 8th row, 3rd column – Include LUCs.*

Response: The requested revision has been made.

11. **Comment:** *Table 3, 10th row, 1st column – Should “EPIC” be included in the site ID?*

Response: “EPIC” should not be included and has been removed.

12. **Comment:** *Table 3, 10th row, 4th column – Add “1” after “AOC”.*

Response: The requested revision has been made.

13. **Comment:** *Table 3, 12th row, 4th column – Remove the space after “K”.*

Response: The requested revision has been made.

14. **Comment:** *Section 2.6, 2nd paragraph, last sentence – Change “their” to “its” and “uses” to “use”.*

Response: The requested revisions have been made.

15. Comment: Section 2.7.1, 1st paragraph, 2nd sentence – What is the “other worker”?

Response: The “other worker” is a future site worker exposed to the soil at typical industrial (or site worker) exposure rates used at the time the report was prepared. For clarification “future adult other worker” has been revised to “future adult other (industrial or site) worker”.

16. Comment: Section 2.7.1, Soil sub-heading, 2nd paragraph, 1st sentence – Change “An NTCRA” to “A NTCRA”.

Response: The requested revision has been made.

17. Comment: Section 2.7.1, Groundwater sub-heading, Arsenic sub-heading – Some of the information under this sub-heading could be added to the page before Table 5.

Response: The requested revision has been made.

18. Comment: Section 2.7.1, Groundwater sub-heading, Arsenic sub-heading, 1st bullet – Add “in site groundwater” to the end of the bullet.

Response: The requested revision has been made.

19. Comment: Section 2.7.1, Groundwater sub-heading, Arsenic sub-heading, 4th bullet – Is “indexes” the correct term or should it be changed to “indices”?

Response: Either term is accurate. Therefore, no revision has been made.

20. Comment: Section 2.7.1, Groundwater sub-heading, Lead sub-heading, 2nd paragraph, 1st sentence – It appears this should be a bullet instead of the first sentence of the paragraph.

Response: Correct; the sentence has been removed from the beginning of the paragraph and added as the last bullet in the list of bullets.

21. Comment: Section 2.7.2, Sediment sub-heading, 1st paragraph, 1st sentence – Make “metal” and “pesticide” plural.

Response: The requested revisions have been made.

22. Comment: References, last row, 2nd column – Make “uses” singular.

Response: The requested revision has been made.

Comments from EPA, provided March 11, 2016.

1. Comment: Section 1.3, 1st paragraph, last sentence – Add “under CERCLA” after “Consequently, NFA”.

Response: The requested text has been added after, “Therefore, NFA.”

2. Comment: Section 1.5, signature line for Karen Melvin – Add “Acting” before “Director”.

Response: The requested revision has been made.

3. Comment: Section 2.7.1, Groundwater sub-heading, Lead sub-heading, last paragraph – There’s a period missing between “operations” and “Based on these considerations,”.

Response: The first sentence of the last paragraph was intended to be the last bullet in the list of bullets before the last paragraph and has been added as the last bullet.

4. **Comment:** *Section 2.8, 4th sentence – 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".*

Response: The recommended revision has been made.