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ST JULIENS CREEK
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LETTER AND U S NAVY RESPONSE TO U S EPA REGION III COMMENTS REGARDING
DRAFT FINAL RECORD OF DECISION FOR SITE 2 WASTE DISPOSAL AREA B ST JULIENS
CREEK ANNEX CHESAPEAKE VA

09/28/2010
CH2M HILL

Responses to Comments
Draft Final Record of Decision, Site 2: Waste Disposal Area B,
EPA Designation: OU-2 Landfill B
St. Juliens Creek Annex
Chesapeake, Virginia

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

PREPARED BY: CH2M HILL

DATE: September 28, 2010

Comments from USEPA Legal, provided 22 September 2010.

1. **Comment:** *Throughout text.* Make the requested grammatical and wording changes.

Response: The requested revisions have been made, except as noted below within the responses.

2. **Comment:** *Section 1.4.2, first sentence:* Need to indicate what criteria will be used to determine whether or not to implement the contingency remedy.

Response: The last sentence of the paragraph has been replaced with: "If substantial changes in COC migration trends are observed, and if the results of modeling lead to the recognition of the potential for offsite migration of shallow groundwater COCs at concentrations that may result in exceedances of the surface water criteria, a contingency PRB may be installed to prevent offsite COC migration and discharge to St. Juliens Creek." A note indicating this has also been added to Table 10 (formerly Table 9). The following sentence has been added to the end of the paragraph: "As part of the remedial design, criteria for implementing the PRB will be established and will rely on several factors including, but not limited to: dilution attenuation factors (DAFs), site-specific groundwater and surface water flow rates, and surface water quality criteria."

3. **Comment:** *Section 1.4.2, second sentence:* (I would have thought that placement of the cap would mitigate COC migration potential?)

Response: The placement of the cover will mitigate COC migration potential in soil and waste. However, it may alter the shallow groundwater flow direction and thereby the shallow groundwater COC migration. The sentence has been revised to the following: Placement of the cover may result in changes in the shallow groundwater flow over time, and in turn potential *shallow groundwater* COC migration ~~may occur~~.

4. **Comment:** *Section 1.6, first bullet:* Hardly any concentrations are given. These should be provided, according to the ROD guidance at 6.3.5. See comment in Site Characteristics section (2.5) to remedy this.

Response: See response to the referenced comment.

5. **Comment:** *Figure 1:* (Does the Southern Branch of the Elizabeth River flow north? Where is it on the inset map?).

Response: The Southern Branch of the Elizabeth River is a tidal tributary. The general flow direction is to the north; however, it ebbs and floods. No change has been made to the figure.

6. **Comment:** *Section 2.3, third paragraph:* Is this the repository? Or do you want to say, “Appointments to review the A.R. may be made by contacting:”?

Response: The text reference to the Administrative Record is correct. The text has been revised as suggested.

7. **Comment:** *Figure 3:* I can’t make these edits, but please edit the descriptions to say: “dermal contact *with*” and “inhalation and/or ingestion *of*” groundwater, etc.

Response: The requested revisions have been made.

8. **Comment:** *Section 2.5.1:* Throughout the section, insert concentrations for the contaminants that are discussed.

Response: Table 2, which lists the COCs for each media, has been inserted to include the maximum detected concentration of each COC. A reference to the table has been added to the introductory paragraph. Because there are no deep groundwater COCs, the table does not provided concentrations of constituents detected in deep groundwater and they have, therefore, been added to the text. The subsequent table numbers have all been increased by 1.

9. **Comment:** *Section 2.5.1, Waste and Soil, second paragraph:* In the eighth sentence, insert “they” after “however”. In the tenth sentence, regarding sample location 17SS03, Where is this well? I can’t find it on Figure 4. (Is it 17S003?)

Response: The text has been corrected to reference 17SO03.

10. **Comment:** *Section 2.5.1, Waste and Soil, second paragraph, last sentence:* Including X, Y, Z? (regarding the inorganics detected in surface and subsurface soil).

Response: The text has been revised to indicate that 19 inorganics, including antimony, cadmium, copper, cyanide, lead, and zinc, have been detected in surface soil and subsurface soil above background concentrations. The basis for the selection of the example inorganics is a detected concentration more than 2 orders of magnitude greater than a background concentration.

Comment: Section 2.5.1, *Deep Groundwater*, second-to-last sentence: Insert “MCLs were” in front of “available” and “the” after “exceed”.

Response: The text has been revised to: “Four SVOCs and two pesticides were detected in deep groundwater; however, concentrations did not exceed the MCLs.” The revision was proposed during the VDEQ Tier 2 review concurrent to EPA legal review.

11. **Comment:** Section 2.7.1, *Human Health Risk Summary*, first paragraph: To be protective, EPA uses the RME scenario, unless there are good reasons to shift to CTE. This description of CTE contains somewhat “loaded” language: “more realistic”. That’s a judgment based on who you are trying to protect. I would recommend saying something more neutral like “whereas the CTE scenario reflects human exposure to the average [or “arithmetic mean”] concentrations at a site.”

Response: The wording has been revised as suggested.

12. **Comment:** Section 2.7.1, *Human Health Risk Summary*, *Waste and Soil*, first paragraph: It would be useful to point out in connection with this comment that the RME values that exceeded 1.0 were still very low: 1.1; 1.2; and 1.7, and the latter was iron, a human nutrient.

Response: Although the HQs for antimony, iron, and vanadium are close to 1.0 for some exposure routes (e.g., child resident ingestion of soil), they are not low for all (e.g., child resident dermal exposure to soil). In addition, the constituents contribute to the cumulative HQ greater than 1.0. Therefore, discussion of the proximity of the HQs to 1.0 has not been added to the text.

13. **Comment:** Section 2.7.1, *Human Health Risk Summary*, *Shallow Groundwater*, second paragraph: This lead-in sentence is misleading. At first I thought it meant that these were the only COPCs with elevated risks/hazards. Maybe an insert, as suggested, would help: Arsenic, iron, manganese, and 2,6-dinitrotoluene *were among the contaminants identified as potentially causing unacceptable human health risks.* of these contaminants in groundwater resulted in cancer risks or non-cancer hazards above USEPA’s acceptable levels based on RME calculations.

Response: The suggested revisions have been made.

14. **Comment:** Section 2.7.1, *Human Health Risk Summary*, *Shallow Groundwater*, *Iron*: Can we add a statement about it being a human nutrient? (What is the RDA?)

Response: The fact that the concentration of iron is less than the established background concentration is adequate for risk management. Therefore, no change has been made to the text.

15. **Comment:** Draft Final Table 2 (now Table 3): In the definition of **, change the first “EPC” to “EPCs”. In the *** definition, insert “a” between “not” and “current” in the second sentence. How about using italics (as in Eco risk chart Table 3 [now Table 4]) to indicate COPCs not identified as COCs based on risk management considerations presented in Section 2.7.1?

Response: The requested revision has been made.

16. **Comment:** Section 2.7.1, Human Health Risk Summary, Deep Groundwater, first paragraph: In the fourth sentence, Is this really “HI” or do you mean “HQ”?

Response: The text should indicate HQ instead of HI. However, it has been deleted based on the next comment.

17. **Comment:** Section 2.7.1, Human Health Risk Summary, Deep Groundwater, first paragraph: Is this really relevant? I thought the cumulative, target organ effect was the only thing that really mattered.

Response: Text relating to the individual constituents has been deleted.

18. **Comment:** Section 2.7.2, Ecological Risk Summary, Direct Exposure Assessment, Aquatic Receptors, fourth paragraph, Mercury bullet: (Is that what this is?) (regarding “consistent with levels detected in urbanized soil and sediment”).

Response: Urbanized soil and sediment, introduced within the Expanded RI Report, has been added to the references for the document.

19. **Comment:** Section 2.7.2, Ecological Risk Summary, Direct Exposure Assessment, Aquatic Receptors, fourth paragraph, Vanadium bullet: If the HQ is at 1, then why was this one included in the list?

Response: “at” has been changed to “approximately equal to” in the referenced text.

20. **Comment:** Draft Final Table 3 (not Table 4): Regarding “CCME”, (What is this?)?

Response: “CCME” has been replaced with “The Canadian Council of Ministers of the Environment”.

21. **Comment:** Draft Final Table 3 (now Table 4), second * definition: Where does this occur in this chart? I can’t see it.

Response: The * is with the naphthalene in surface soil concentration. No changes have been made to the text.

22. **Comment:** Draft Final Table 4 (now Table 5), notes: Correct the spelling of “reptiles” and shouldn’t <COPCs> be COCs, as in the chart?

Response: The headers of (former Tables 2 and 4 (current Tables 3 and 5) have been changed from COC to COPC. The notes at the bottom of the table clarify that not all COPCs were retained as COCs.

23. **Comment:** Section 2.8, shallow groundwater, fourth bullet: Delete everything after “practicable”. This is a remedial response action, not an RAO. I created a new bullet to capture this RAO.

Response: The requested changes have been made.

24. **Comment:** Section 2.8, shallow groundwater: Insert a fifth bullet: “Prevent human exposure to contaminants present in groundwater at levels that pose unacceptable risks.”

Response: The following bullet, modified slightly from the suggestion, has been inserted: “Prevent human exposure to COCs present in groundwater at concentrations that pose unacceptable risks.”

25. **Comment:** *Draft Final Table 6 (current Table 7), Page 2:* What is this part of the chart? Pesticides in groundwater? It’s a little unclear. Maybe add a lavender line at the top on this side to say “Groundwater (continued).”

Response: The table’s formatting has been corrected.

26. **Comment:** *Draft Final Table 6 (current Table 7), first note:* How will we know that cleanup of the surface water and sediment pore water has been achieved if we haven’t established cleanup levels to compare against sample results following completion of the remedial action?

Response: The remedial action will eliminate surface water and sediment pore water at the site. Therefore, cleanup levels are not necessary. The table note has been revised to clarify the removal of those media.

27. **Comment:** *Section 2.9.1, Primary Remedial Alternatives, first paragraph, fourth sentence:* Table 7 (current Table 8) is good, but, for clarity, you also need to name the 8 Alternatives, and discuss the fact that, other than the No Action Alternative, they are identical as far as their treatment of everything except the High-concentration Target Area and the Low-concentration Target Area. Describe the common elements briefly and identify the variations by category. Otherwise, it is hard to keep them all in mind. I suggest names like: 1) No Action; 2) Cover, Excavation of Creek sediment, and LUCs; 3) Cover, Excavation of Creek sediment, and LUCs, and Sheet Pile Barrier in High-concentration Target Area; etc..

Response: A bulleted list naming each of the remedial alternatives has been added to Section 2.9.1, followed by the following paragraph: “Each alternative employs the same technologies for addressing the waste, soil, and inlet sediment area; St. Juliens Creek sediment area; heptachlor epoxide target area; and naphthalene target area. The alternatives differ only in their technologies for addressing the high-concentration and low-concentrations target areas; therefore, the comparative analysis presented below focuses on these technologies”.

28. **Comment:** *Section 2.9.1, Contingency Remedy Component:* Where will <the PRB> go? What will it prevent/achieve? Need to describe the contingency remedy more fully as in PRAP, Section 7.

Response: The paragraph has been revised to the following: “A PRB has been developed as a contingency measure for potential addition to the selected remedy. Each of the remedial alternatives includes placement of a soil cover, which will likely result in changes in the shallow groundwater flow over time, and in turn potential shallow groundwater COC migration may occur. The PRB is an underground vertical “wall”, through which groundwater passes, that is constructed of material that facilitates the breakdown of site contaminants. To enhance the PRBs effectiveness, it is assumed that a reactive material [e.g. emulsified oil substrate (EOS) or zero valent iron] will be injected into the “wall” throughout the remediation timeframe. The primary remedial alternatives

are protective based on current conditions, but there is uncertainty with how conditions may change (e.g., groundwater flow trending more towards St. Juliens Creek) as the remedy is implemented. If substantial changes in COC migration trends are observed, and if the results of modeling lead to the recognition of the potential for offsite migration of shallow groundwater COCs at concentrations that may result in exceedances of the surface water criteria, a contingency PRB may be installed downgradient of the shallow groundwater plume to prevent offsite COC migration and discharge to St. Juliens Creek. As part of the remedial design, criteria for implementing the PRB will be established and will rely on several factors including, but not limited to: DAFs, site-specific groundwater and surface water flow rates, and surface water quality criteria.”

29. **Comment:** *Section 2.9.1, Contingency Remedy Component, last sentence:* Need to be as specific as possible regarding the criteria to be used to invoke the contingency remedy.

Response: See response to Comment 28.

30. **Comment:** *Section 2.9.2, first paragraph:* Add relative ranking lists to each criterion discussed below (except maybe ARARs section, which is pretty much yes or no.)

Response: Ranking lists have been added to the Primary Balancing Criteria. See criteria specific comments below for rankings. Rankings were based upon current Table 9, the text in Section 2.9.2, and Table 5-2 in the final Feasibility Study.

31. **Comment:** *Section 2.9.2, Overall Protection..., last paragraph:* How do the alternatives rank with respect to this criterion? They all do the job, but some must be better than others. I suggest: 8, 7, 5, 4, 6, 3, 2. It’s just a suggestion, but that’s what I’m looking for.

Response: Each alternative is protective of human health and the environment. To be consistent with the SJCA Partnering Team’s interpretation and use in the FS and PP, this criteria does not consider those factors that may distinguish one alternative as being more protective (i.e. timeframe for achieving RAOs), but rather is a yes or no type answer. Therefore, individual rankings have not been added. They are accounted for in the balancing criteria.

32. **Comment:** *Draft Final Table 7 (current Table 8), Alternative 2, Cover and LUCs, second bullet:* Change “maintain the cover and” to “[prohibit digging, etc.?].

Response: No change has been made, as discussed during the September 22, 2010, SJCA Partnering Team Meeting conference call.

33. **Comment:** *Draft Final Table 7 (current Table 8), Alternative 2, Cover and LUCs:* Add LUC prohibiting residential use.

Response: See response to Comment 54. Additionally, the 2nd bullet was revised to include exposure via vapor intrusion and now reads “Implement and maintain LUCs to prevent unrestricted exposure to shallow groundwater and/or shallow groundwater vapors until conditions allow for unlimited use and unrestricted exposure.”

34. **Comment:** *Draft Final Table 7 (current Table 8), Alternative 3, Sheet Pile:* (Does this entirely encircle the target area? Then where does the water go? Nowhere?)

Response: The sheet pile is expected to encapsulate the entire high-concentration area and thus “trap” the shallow groundwater to prevent migration of contaminant mass. The technology description was revised to read: “Install impermeable sheet pile barrier surrounding the target area to create a hydraulic barrier, preventing migration of chlorinated VOCs outside of the high-concentration target area.”

35. **Comment:** *Draft Final Table 7 (current Table 8), Alternative 4, ERD:* Make sure to spell out first use here or in the text.

Response: ERD first used in Section 1.4.1. No change to the table was made.

36. **Comment:** *Draft Final Table 8 (current Table 9):* Under Overall Protection, how can Alt 2 be as good as all the others when they include the cover & excavation and LUCs and then more treatment or other remedial components on top of that? Under Long-term effectiveness: Same question. How could Alt 2 be better than the others when they all include the components of Alt 2?

Response: Regarding Overall Protection, see response to Comment 31. Regarding Long-term Effectiveness, see response to Comment 39.

37. **Comment:** *Section 2.9.2, Compliance with Applicable...,second paragraph, fifth sentence:* What injections are included in the contingency remedy? It needs to be described better, above.

Response: The text has been revised. See response to Comment 28.

38. **Comment:** *Section 2.9.2, Compliance with Applicable...,second paragraph, sixth sentence:* Was <asbestos> ever mentioned before? What ARAR? Specify.

Response: Asbestos has been removed from the section, as historical records do not indicate its potential present at the site and it was not observed during investigation activities. Reference to 40 CFR 761.50 and .61 has been added to the last sentence of the paragraph.

39. **Comment:** *Section 2.9.2, Long-term...,second paragraph, second sentence:* This doesn't seem possible, given all the treatment added beyond Alt 2.

Response: The sentence was deleted and the sentence was revised to read “Although residual risks for Alternatives 2, 4, 5, 7, and 8 are anticipated at the same magnitude; because of the excavation and offsite disposal of the area with the highest contaminant concentrations, Alternatives 7 and 8 may result in slightly lower residual risk. Similarly, because of the active treatment of the high- and low-concentration target areas under Alternatives 4 and 5, they are expected to result in slightly lower residual risk than Alternative 2, which relies on natural attenuation.”

40. **Comment:** *Section 2.9.2, Long-term...,second paragraph, third sentence:* Why isn't it necessarily so that Alts 7 & 8, which excavate the source area contaminants, will result in lower residual risk?

Response: It is anticipated that Alternatives 7 and 8 will result in lower residual risk, which is why they are scored higher. However, because of the uncertainty associated

with the potential presence of DNAPL at the site, it cannot be stated that it will definitely result.

41. **Comment:** *Section 2.9.2, Long-term..., second paragraph, fourth sentence:* Isn't this also true of Alt 2, regarding its reliance on containment? Or is the cover not a containment remedy? Also, Alt 6 includes treatment.

Response: The reference to containment is in regards to groundwater containment. Containment remedy employed in Alternative 2, and all other Alternatives, is for waste and soil. The sentence was revised to clarify and now reads: "Alternatives 3 and 6 have lower levels of long-term reliability because of their dependence on groundwater COC containment, the potential for failure over time, and the need for replacement or maintenance."

42. **Comment:** *Section 2.9.2, Long-term..., second paragraph, last sentence:* Relative ranking? I seem to confuse Overall Protection and Long-term effectiveness and permanence, but I came up with the same suggested ranking: 8, 7, 5, 4, 6, 3, 2.

Response: The sentence was revised to read: "Each alternative is expected to achieve long-term effectiveness and permanence at the conclusion of remedial activities; however, when compared against one another the alternative rankings from highest to lowest are 8, 7, 5, 4, 2, 6, and 3." Alternatives 3 and 6 were ranked lower than Alternative 2 (variation from your recommendation) due to their reliance on groundwater containment and the potential for failure over time.

43. **Comment:** *Section 2.9.2, Reduction in Tox..., second paragraph, last sentence:* Ranking? I suggest: 5, 4, 6 & 8.

Response: The following sentence was added prior to last sentence: "Therefore, when compared against one another the alternative rankings from highest to lowest are 5, 4, 6, and 8."

44. **Comment:** *Section 2.9.2, Short-term..., second paragraph, last sentence:* What does this have to do with short-term effectiveness? This should be moved to the discussion I am requesting that you insert discussing the common elements of the 7 alternatives.

Response: The sentence has been moved to the end of the opening paragraph of Section 2.9.1, Primary Remedial Alternatives.

45. **Comment:** *Section 2.9.2, Short-term..., second paragraph, last sentence:* Ranks? I suggest: 5, 4, 2, 3 & 6, 7 & 8.

Response: The following sentence was added to the end of the second paragraph: "Therefore, when compared against one another the alternative rankings from highest to lowest are 5, 4, 2, 3, 6, 8, and 7." Alternative 8 was ranked higher than Alternative 7 due to active treatment in the low-concentration target area.

46. **Comment:** *Section 2.9.2, Short-term..., third paragraph, first sentence:* Similar to what? Do you mean that the addition of the contingency remedy would impact the other alternatives equally with respect to short-term effectiveness?

Response: Implementation of the contingency remedy would impact each of the alternatives equally. The opening sentence of the paragraph was revised to read: “The short-term effectiveness of the contingency remedial component, if implemented, would be equal when added to any of the primary alternatives. “

47. **Comment:** *Section 2.9.2, Short-term..., third paragraph, second sentence:* I thought it would help achieve levels at the edge of the low-concentration target area. ?? Doesn't the treatment involved help to speed up the overall cleanup?

Response: Although the PRB would reduce COC concentrations in groundwater to the cleanup levels as groundwater pass through the PRB, treatment relies on advective transport of the COCs to the PRB. It is not anticipated that the groundwater COCs from the northern portion of the site would reach the PRB for treatment in less time than they would be treated by the primary remedy. Therefore, no revisions to the text have been made.

48. **Comment:** *Section 2.9.2, Implementability, second paragraph, second sentence:* Does reliability of performance really come into consideration for this criterion?

Response: Section 300.430 (9)(iii) (1) of the NCP identifies “Technical feasibility, including...the reliability of the technology ...” as a criterion for assessing the implementability of an alternative. Because there is no guarantee that the natural degradation of COCs will continue over time, and unlike ERD, there are no measures under MNA that can be taken to maintain the operation of this technology (i.e., additional ERD injections), MNA alone is considered to be less reliable and Alternative 2 is considered to be less implementable. No changes have been made to the text.

49. **Comment:** *Section 2.9.2, Implementability, second paragraph, fourth sentence:* A soil cover is less reliable than ERD injections? I don't really see how that is connected to implementability.

Response: The soil cover is a component to every alternative. The discussion focuses on the shallow groundwater remedial component, which varies by alternative. The shallow groundwater remedial component of Alternative 2, MNA, is less implementable than the shallow groundwater remedial component of Alternatives 4 and 5, ERD. The text has been revised to emphasize the difference.

50. **Comment:** *Section 2.9.2, Implementability, second paragraph, last sentence:* Ranking? I suggest: 5,4,2,6,3,7&8.implementability.

Response: The following sentence was added prior to the last sentence of the paragraph: “Therefore, when compared against one another the alternative rankings from highest to lowest are 5, 4, 2, 8, 7, 6, and 3.” Alternatives 3 & 6 were ranked lower than Alternatives 7 & 8 due to lack of proven effectiveness associated with the technologies.

51. **Comment:** *Section 2.9.2, Cost, second sentence:* None of the treatment alternatives expect to achieve the cleanup in less than 30 years?

Response: Because DNAPL is potentially present at the site, it is not anticipated that cleanup levels will be achieved in less than 30 years for any alternative. Therefore, no changes have been made to the text.

52. **Comment:** *Section 2.11.2, Cover Over Waste, Soil, and Inlet Sediment, last sentence: Acreage? Will this be a 1:1 replacement?*

Response: The ratio of replacement has not yet been determined and will be negotiated with the USACE through submittal and approval of a compensatory mitigation plan during the remedial design process.

53. **Comment:** *Section 2.11.2, MNA of..., second paragraph, last sentence: But we don't like to rely on this.*

Response: The sentence has been deleted.

54. **Comment:** *Section 2.11.2, Land Use Controls, first paragraph, second bullet: This objective needs to be stated upfront and in the chart describing the remedy components.*

Response: The referenced LUC objective has been removed because it is redundant with the first LUC objectives (prohibit digging into or disturbing the cover). The prohibition of new building construction, aside from being related to digging into the cover, is tied to potential future vapor intrusion risk associated with shallow groundwater. That potential risk is protected against by the shallow groundwater LUC restricting construction of new buildings without further evaluation of vapor intrusion pathways or incorporation of vapor intrusion mitigation measures.

55. **Comment:** *Section 2.11.2, Land Use Controls, second paragraph, first bullet: "Prohibit"? As the next bullet says?*

Response: Contact with shallow groundwater is restricted to situations when the proper precautions and engineering controls in place, and is therefore not prohibited. No change to the text has been made.

56. **Comment:** *Section 2.11.3, first paragraph, last sentence: Can we be any more precise about what the trigger will be to implement the contingency remedy?*

Response: The last sentence was revised to read: "If substantial changes in COC migration trends are observed, and if the results of modeling lead to the recognition of the potential for offsite migration of shallow groundwater COCs at concentrations that may result in exceedances of the surface water criteria, a contingency PRB may be installed to prevent offsite COC migration and discharge to St. Juliens Creek. As part of the remedial design, criteria for implementing the PRB will be established and will rely on several factors including, but not limited to: DAFs, site-specific groundwater and surface water flow rates, and surface water quality criteria."

57. **Comment:** *Section 2.11.3, second paragraph, first sentence: In Figure 6 the PRB is within the Site 2 boundary, which makes sense. In the PRAP the description says that it would be installed downgradient of the shallow groundwater plume.*

Response: The PRB will be installed within the Site 2 boundary, downgradient of the shallow groundwater plume. The sentence of the paragraph was revised to read: "If

required, the PRB will be constructed along, or as close as possible to, the downgradient edge of the shallow groundwater plume, underground, to intercept groundwater flow and provide a preferential path through reactive materials [e.g. EOS or zero valent iron].”

58. **Comment:** *Section 2.11.3, second paragraph, first sentence:* What is this? (regarding EOS)

Response: The acronym EOS stands for emulsified oil substrate. Definition of the acronym was added to the sentence of the paragraph as noted in Comment 28.

59. **Comment:** *Section 2.11.3, last paragraph, fifth sentence:* Wouldn't this be a big deal to move it?

Response: The PRB will not be physically moved after it is installed. However, the proposed location is conceptual based on current site conditions, and will need to be revised prior to installation of the PRB, if required. “proposed” has been inserted in the sentence before “location.”

60. **Comment:** *Section 2.11.6, Five-Year Review Requirements, last sentence:* VA was a party to the FFA, right?

Response: VDEQ signed the FFA on May 24, 2004.