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ST JULIENS CREEK  
5090.3a

LETTER AND U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL  
QUALITY COMMENTS REGARDING DRAFT FINAL RECORD OF DECISION FOR STIE 2  
WASTE DISPOSAL AREA B ST JULIENS CREEK ANNEX CHESAPEAKE VA

09/03/2010  
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**

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DATE: September 3, 2010

**Comments from VDEQ, provided 25 August 10.**

1. **Comment:** Section 2.5.1, Deep GW, 2nd and 3rd sentences from bottom – what does “where available” mean and is the latter sentence referring to the former? If so, please combine the two into one sentence.

**Response:** The two sentences have been revised to read: “Four SVOCs and two pesticides were detected in deep groundwater; however, concentrations did not exceed MCLs.”

2. **Comment:** Section 2.8 – didn’t we decide to change “CVOCs” in the RAOs to “COCs”?

**Response:** The partnering team decided to change the last shallow groundwater RAO from chlorinated VOCs to COCs (“Reduce COC concentrations to the maximum extent practicable...”) after realizing that there was no RAO associated with the naphthalene and heptachlor epoxide in shallow groundwater, but did not discuss changing any of the other RAOs. In response to this comment, “chlorinated VOCs” has been changed to “COCs” in all of the shallow groundwater RAOs.

3. **Comment:** Section 2.9.2, Compliance with ARARs – change first sentence to, “Compliance with ARARs addresses whether a remedy will meet all of the applicable or relevant and appropriate requirements of Federal and State environmental laws, or whether there is a basis for invoking a waiver.

**Response:** The sentence has been revised as requested.