

Staszak, Janna/VBO

From: Doran, Karen [Karen.Doran@deq.virginia.gov]
Sent: Wednesday, September 23, 2009 7:21 AM
To: Staszak, Janna/VBO; walt.j.bell@navy.mil; Stroud.Robert@epamail.epa.gov; Jones, Adrienne/VBO
Subject: RE: SJCA Site 21 Interim ROD ARARs - VDEQ comments

Team -

See below for VDEQ comments on the ARARs table.

The Virginia Department of Environmental Quality (VDEQ) does not submit comments on the ARARs table for the Site 21 Interim ROD at this time. Since this is an Interim ROD, the ARARs table will be reviewed by VDEQ again during the Final ROD for the site.

Please note, as part of the DoD and State Memorandum of Agreement (DSMOA) the Commonwealth (represented by VDEQ) is tasked to provide identification and explanation of all state ARARs related to response actions at the DoD installation (see VA DSMOA 8-31-90, Section I.B.2). State laws and regulations that are ARARs and not identified in the ARARs list must still be followed.

Thanks!

Karen

From: Janna.Staszak@CH2M.com [mailto:Janna.Staszak@CH2M.com]
Sent: Wednesday, September 16, 2009 4:28 PM
To: walt.j.bell@navy.mil; Doran, Karen; Stroud.Robert@epamail.epa.gov; Adrienne.Jones@CH2M.com
Subject: SJCA Site 21 Interim ROD ARARs
Importance: High

Team,

Based on the recent attention to ARARs (which we discussed a little during our last partnering meeting), we've revisited and refined the ARARs for the Site 21 Interim ROD. The revised ARARs table is attached for your review. Please let us know if you are Ok with the new version, and if so we will incorporate it into the Final Interim ROD in place of what was in the draft document. We realize that this is coming a little last-minute since we are trying to finalize the ROD by the end of this month, but feel that it's important to address the concerns that have been raised by legal prior to finalizing the document. The changes we've made are consistent with those made recently in Little Creek and NNSY documents, and those changes were made with Navy and team legal involvement.

Let us know your thoughts or concerns, or if you'd like to further discuss.

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