Responses to Comments
Draft Interim Proposed Plan
Site 21: Industrial Area
St. Juliens Creek Annex
Chesapeake, Virginia

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DATE: May 8, 2009

Comments from EPA, provided 23 March 09.

1. ***Comment:*** Please note in the introduction that comments are encouraged on all alternatives as well as the rationale for the preferred alternative.

   Response: The last sentence of introduction has been revised from "Therefore, public participation is encouraged." to now read "Therefore, public commenting on the alternatives, the rationale for selection of the preferred alternative, and the preferred alternative is encouraged."

2. ***Comment:*** **Section 7.** Please identify the preferred alternative at the beginning of the "Summary of Remedial Alternatives" section as stated in the "Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents".

   Response: This section has been revised to include the following sentence immediately following the bulleted list of alternatives evaluated, "Based upon the results of the evaluation, ISCR and ERD (Alternative 3) was selected as the Preferred Alternative for Site 21."

3. ***Comment:*** **Section 8.2.** Delete repeated period about halfway down the long-term effectiveness description.

   Response: The suggested revision has been made.

4. ***Comment:*** **Section 9.** 2nd full paragraph starting with "Long-term monitoring". Please change the second monitoring to evaluate.

   Response: The second 'monitoring' referenced in Comment 9 has been replaced with the word 'evaluate'.

5. *Comment:* **Glossary.** Enhanced Reductive Dechlorination - Please add ERD in parenthesis. Hazard Index – Please revise population.

   Response: "(ERD)" has been added to the term Enhanced Reductive Dechlorination. The word "population" in the term Hazard Index has been corrected.

Comments from EPA Tox, provided 10 April 2009

1. *Tox Comment:* **Section 5.1, Human Health Risk Summary, page 6**. The first paragraph suggests inhalation risk from "breathing indoor air" was evaluated however, Section 4 clearly indicates this pathway will be evaluated in a separate Proposed Plan. Therefore, this statement should be removed from the report to avoid reader confusion.

   Response: As discussed in the Remedial Investigation paragraph of Section 2.2, the human health risk associated with breathing indoor air was evaluated during the initial RI. However, it was determined during the RI that additional investigation into this exposure pathway should be performed due to uncertainties of the modeling method. The results of the indoor air vapor evaluation are provided in the fifth paragraph of Section 5.1, following the discussion of the other media evaluated. Because the additional investigation of this exposure pathway was triggered by evaluation during the HHRA, the reference to the evaluation of indoor air has not been removed.

   For reader clarification, the sentence referenced in Section 4 has been revised to read, "Potential risk to indoor workers due to inhalation of indoor air from vapor intrusion is currently under additional investigation (see Remedial Investigation discussion in Section 2.2)." Additionally, all references to the investigation for indoor air vapor that resulted from the original evaluation in the HHRA have been revised to read "additional investigation" to remind the reader that the original evaluation in the HHRA recommended further investigation.

2. *Tox Comment:* **Section 5.0, Shallow Groundwater, page 7**. Since the inclusion of arsenic as a COC at this site has been under considerable debate, the language offered within the report (However, the remedy evaluation did take into consideration the potential for the mobilization of naturally occurring arsenic) appears vague and does not include the language that was verbally agreed upon. The report should clearly indicate the measures that will be taken to address arsenic mobilization and subsequent high arsenic detections, if necessary. The vague language included in this paragraph truly concerns me since no true remedial plan is offered for arsenic. A reader with little to no knowledge could read this Proposed Plan and not be aware of EPA's concern with arsenic mobilization and the navy's commitment to remedy arsenic.

   Response: To further emphasize the consideration of arsenic at Site 21, the following sentence has been added to the end of the Shallow Groundwater paragraph, "Based upon this evaluation, monitoring will be performed to confirm if naturally occurring arsenic is mobilized as a result of the selected

alternative. If so, monitoring will continue in order to track the trend and determine if concentrations are returning to a level that does not pose unacceptable risk to potential receptors." Additionally, a bulleted item has been added to Alternative 3 for long term monitoring on Table 4 to state, "…concentrations of naturally occurring metals (including arsenic), if mobilized by reducing conditions, remain below or return to levels that do not pose unacceptable risk to potential receptors."

3. ***Tox Comment:*** **Risk Table, page 8.** The Non-Cancer Hazard Index of 0.38 for inhalation of TCE while showering is not included in the Draft RI Report dated December 2007. Please make sure these results are included in the Final RI report.

   Response: Comment noted. The non-cancer hazard index of 0.38 for inhalation of TCE while showering is included in Appendix I (HHRA tables) of the Final RI Report, dated June 2008. TCE is also listed in Table 7-4.

Comments from VDEQ, provided 10 April 2009

1. ***Comment:*** **Section 4, Second sentence.** Please delete "a".

   Response: The suggested revision has been made.

2. ***Comment:*** **Section 4, Second paragraph.** First sentence is awkward, change to "…currently in the RI/FS phase of the CERCLA process."

   Response: The sentence has been revised to read as follows, "In addition to Site 21, two sites (Sites 2 and 5) are currently in the RI/FS phase of the CERCLA process."

3. ***Comment:*** **Section 5.1.** Halfway down, sentence starting "This information…" – remove "were".

   Response: The suggested revision has been made.

4. ***Comment:*** **Section 5.1, Shallow Groundwater, last three sentences.** Does any of this need to be changed based on our discussion at the last partnering meeting?

   Response: The text has been revised as discussed in EPA Tox Comment 2.

5. ***Comment:*** **Section 10.** Check dates in this section, I believe we changed the public meeting date at the partnering meeting.

   Response: The following dates have been revised throughout the document: Public Comment Period – July 9, 2009 – August 24, 2009 and Public Meeting – August 6, 2009.