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LETTER AND U S NAVY RESPONSE TO U S EPA REGION III COMMENTS REGARDING  
DRAFT RECORD OF DECISION FOR SITE 32 WETLANDS AREA DOWNGRADIENT OF  
BEAVER POND NWS YORKTOWN VA

05/24/2011  
CH2M HILL

**CH2MHILL**

May 24, 2011

Mr. Moshood Oduwole  
Office of Federal Facility Remediation  
United States Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Subject: Response to Comments on *Draft Record of Decision 32: Wetlands Area  
Downgradient of Beaver Pond, Naval Weapons Station Yorktown, Yorktown,  
Virginia, April 2011*

Dear Mr. Oduwole:

On behalf of the U.S. Department of the Navy's Naval Facilities Engineering Command (NAVFAC), CH2M HILL has prepared this letter in response to your May 10, 2011 e-mail, providing comments for the subject document (via both scanned markups and track changes in the Word file). Comments received are shown in *italics*, followed by the Navy's response.

Comments from USEPA Remediation Project Manager (RPM):

- ❖ *Comment #1 – [Section 1; of No Action] There was a NTCRA conducted at the site. This can no longer be called a "No Action" but a "No Further Action" ROD. Please revise all reference to "No Action" in this document.*

**Response:** All occurrences of No Action were changed to No Further Action or NFA, as appropriate.

- ❖ *Comment #2 – [Figures 1-4] Please include a north arrow on the map. Anything in the Legend needs to be represented on the map.*

**Response:** The north arrow, currently located within the legend of each figure, was moved to the top left corner of Figures 1 through 4.

- ❖ *Comment #3 - [Section 2.1; Sewage Treatment Plant..... the trickling filter] There is need to mention here that STP 2 will be investigated (or currently under investigation?) in order to make sure it is not a continuous source of discharge to Site 32*

**Response:** An explanation that STP 2 will be investigated to determine if a release to soil and groundwater occurred due to historical activities associated with STP 2 was added to the end of Section 2.1

Mr. Moshood Oduwole  
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Comments from USEPA Legal:

❖ Comment #1 - [Section 1; No Action] Isn't it No Further Action, since there was a NTCRA?

**Response:** All occurrences of No Action were changed to No Further Action or NFA, as appropriate.

❖ Comment #2 - [the Site] either use Site 32 or identify in the beginning (Site 32 or Site)

**Response:** All occurrences of the site were changed to Site 32, as appropriate.

In addition, editorial changes were made however they are not discussed on a case by case basis within this letter. If you have any questions or comments regarding the above response to comments, please feel free to contact me at 757-671-6273.

Sincerely,

CH2M HILL



Stephanie Sawyer  
Project Manager

cc: Mr. Thomas Kowalski/NAVFAC  
Mr. Wade Smith/VDEQ  
Mr. Bill Friedmann/CH2M HILL  
Mr. Adam Forshey/CH2M HILL  
Project File