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EMAIL AND THE U S NAVY RESPONSE TO THE DEPARTMENT OF ENVIRONMENTAL
QUALITY ARAR COMMENTS ON THE ENGINEERING EVALUATION/COST ANALYSIS SITE
24 AVIATION FIELD NWS YORKTOWN VA
02/03/2015
CH2M HILL

From: Friedmann, William/VBO
Sent: Tuesday, February 03, 2015 3:07 PM
To: Smith,Wade
Cc: Peed, Bryan K CIV NAVFAC MIDLANT, EV; Price, Nathaniel/VBO; Anderson, Mary/VBO
Subject: Response to VDEQ ARAR Comments - Yorktown Site 24 EE/CA
Attachments: ARARs_YorktownSite24_EECA_v2.xlsx

Wade,

The attached spreadsheet captures the changes to the Site 24 EE/CA ARARs table based on VDEQs comments received on January 5, 2015. The spreadsheet shows changes in red. The original comments are below with an explanation on how they were addressed. Please provide these to Michelle for her review.

1. **Comment:** The ARARs table found in Appendix B of this EE/CA list some citations incorrectly and must be updated to reflect the changes as listed in the referenced 2013 document. The following are the specific citations that must be corrected:

- Virginia Erosion and Sediment control is now 9-VAC-25-840-10 et seq.
- Virginia Storm Water Management Program is now 9-VAC-25-870-10 et seq.

Response: Agreed, the citations have been revised to 9 VAC 25-840-40(1); (2); (3); (4); (17); (18); (19)(h), (i) and 9 VAC 25-870-54 (A, B and D), 55 (B)(1-8).

2. **Comment:** Alternative 2 includes the construction of a soil cover over the waste disposal areas and the hot spot areas. Please add the following provisions to the Virginia Solid Waste Management Regulations listed in table B-6. (9VAC20-81- 40.B.C, 45.B.2(f), 90, 95,120, 130, 140, 160, 170, 200, 210, 250, 310, 320, 330, 395) these requirements apply to the management and care of waste stored on site, waste piles, and the management of solid waste.

Response: Operations at this site ceased prior to the October 9, 1993 date, therefore these regulations are neither applicable nor relevant and appropriate for the wastes that were disposed of during those active operations. However, wastes generated during the response action would be subject to these regulations. It is anticipated that non-hazardous waste will be generated in containers. Therefore Alternative 2 was added to the action-specific ARAR for the management of non-hazardous waste in containers.

Please let us know if you have any questions and please provide comments on the rest of the document as soon as is possible.

Thanks,
Bill



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Table B-1
Federal Chemical-Specific ARARs
Site 24
Naval Weapons Station Yorktown, Virginia

Media	Requirement	Prerequisite	Citation	Alternative	ARAR/TBC Determination	Comment
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No Federal Chemical-Specific ARARs apply.