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MEMORANDUM AND THE VIRGINIA DEPARTMENT ENVIRONMENTAL QUALITY ARAR  
COMMENTS ON THE ENGINEERING EVALUATION/COST ANALYSIS SITE 24 AVIATION  
FIELD NWS YORKTOWN VA  
12/30/2014  
VIRGINIA DEPARTMENT ENVIRONMENTAL QUALITY



**DIVISION OF LAND PROTECTION AND  
REVITALIZATION  
OFFICE OF REMEDIATION PROGRAMS**

**MEMORANDUM**

**TO:** Wade Smith  
**FROM:** Michelle Hollis  
**DATE:** December 30, 2014  
**SUBJECT:** NWSY, Site 24 EE/CA

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I have completed my review of the EE/CA for the above referenced site. Below you will find my comments.

**ARAR Comments**

Appendix B of this document utilizes as a reference the Commonwealth of Virginia, 2004, Preliminary Identification, Applicable or Relevant and Appropriate Requirements, document. Please be aware this reference document was updated October 2013. Please provide the attached 2013 Preliminary list to the facility.

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.

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.