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EMAIL AND THE U S EPA REGION III COMMENTS ON THE SITE 22 RECORD OF
DECISION NWS YORKTOWN VA
08/21/2012
U S EPA REGION III PHILADELPHIA PA

Marrow, Monica/VBO

From: Frank Fritz <Fritz.Frank@epamail.epa.gov>
Sent: Tuesday, August 21, 2012 3:58 PM
To: Moshood Oduwole
Cc: Friedmann, William/VBO; donna.caldwell@navy.mil; james.gravette@navy.mil; katherine.will@navy.mil; Sawyer, Stephanie/VBO; wmsmith@deq.virginia.gov
Subject: Yorktown Site 22 ROD - EPA ORC manager comments

Dear People,

I've just gotten back comments from my manager, Suzanne Parent, and her manager, Cecil Rodrigues. I'll send a track change markup as soon as I can.

However, both noted the same problem about how the ROD describes monitoring (see section 1.4 remedy bullets and section 2.11.2 selected remedy bullets and following sections on pre-design investigation, monitored natural attenuation and performance monitoring and long-term monitoring).

The essence of this portion of their comments are:

- What is performance monitoring? What is its purpose?
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- What is long-term monitoring? What is its purpose? How is it different from performance monitoring?
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- What is the monitoring that we'll do for natural attenuation of RDX and VOCs? What is its purpose? How is it different from, or the same as, performance monitoring or long-term monitoring?
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For example, is performance monitoring only for vegetable oil injections? Is it only for RDX? Is it for VOCs, too?

The language in the ROD about monitoring confused them. They couldn't tell if the different words (performance, long-term, MNA) actually described different things. They felt the ROD did not consistently describe or distinguish three different kinds of monitoring.

They had more comments as well, which I'll pass along as soon as I can.

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