

N61414.AR.001851
NAB LITTLE CREEK
5090.3a

LETTER FROM US EPA REGION III REQUESTING CHANGES BE MADE TO FINAL RECORD
OF DECISION FOR SITE 9 NAB LITTLE CREEK VA

U S EPA REGION III

selected in this Record of Decision

- Reporting to EPA and VDEQ annually on (1) the effectiveness of the institutional controls selected in this Record of Decision, (2) any violations of these institutional controls, (3) actions that have been or will be taken to correct any violations, along with a schedule for such actions, and prevent future violations of, these institutional controls.

Continue with the 5th bullet “Long-term ground water monitoring in accordance with an approved long-term monitoring plan”

page 1-3, sec. 1.4,
last paragraph
(begins “The
institutional control
action for Sites 9 and
10 includes land-use
restrictions . . .”

Delete the last two sentences, which begin:

“The procedures used to assure the effectiveness . . .

Insert instead:

The Navy shall be responsible for implementing, annually monitoring, annually reporting on the effectiveness of, and enforcing the institutional controls selected in this Record of Decision.

2-34, 2.12.2.1, last
bullet (begins
“Institutional controls
shall also involve
annual inspections . .
. .”)

Replace the last bullet with the following:

- Annual inspections of the soil cover will be performed to ensure the integrity of the soil cover and continued compliance with the other prohibitions listed above, including the prohibition against the use of ground water.
- The Navy will take prompt, effective action to correct any violations of, and prevent future violations of, the institutional controls selected in this Record of Decision.
- The Navy shall report to EPA and VDEQ annually on (1) the effectiveness of the institutional controls selected in this Record of Decision, (2) any violations of these institutional controls, (3) actions that have been or will be taken to correct any violations, along with a schedule for such actions, and prevent future violations of, these institutional controls.

2-34, two paragraphs
following the bullets
on institutional
controls

Delete the two paragraphs that follow the bullets on institutional controls. The first of these paragraphs begins “Within 180 days following . . .” The second paragraph begins “Although the terms and conditions . . .”

Insert, in place of these paragraphs, the sentence:

The Navy shall be responsible for implementing, annually monitoring, annually reporting on the effectiveness of, and enforcing the institutional controls selected in this Record of

Decision.

2-34, sec. 1.12.2.1,
last paragraph
(begins "Within 90
days")

Add after bullet number (5) the following:

- (6) A description of how the Navy will annually inspect and ensure compliance with the institutional controls selected in this Record of Decision
- (7) A description of the process for removing or modifying the institutional controls.

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