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January 11, 2008

USEPA Region 3  
Attn: Steven Hirsh  
Mail Code 3HS12  
1650 Arch Street  
Philadelphia, PA 19103-2029

Subject: Response to USEPA Comments  
*Draft EE/CA for Site 18; Former Naval Magazine Waste Storage Area, Naval Station  
Norfolk; Norfolk, Virginia, November 2007*

Dear Mr. Hirsh:

On behalf of the Navy, this response letter has been prepared regarding USEPA's comments dated January 8, 2008 on the *Draft EE/CA for Site 18, Former Naval Magazine Waste Storage Area,, Naval Station Norfolk, Norfolk, Virginia, CH2M HILL, November 2007*. These comments were provided to Ms. Winoma Johnson (NAVFAC MIDLANT) via email on January 8, 2008. The following responses are provided for each comment.

1. EPA concurs with the recommended alternative, Alternative 3, Enhanced Reductive Dechlorination. Previous concerns raised by EPA related to the proposed area to be treated have been resolved.

**Response:**

**No response needed.**

2. In the descriptions of Alternative 2, MNA (executive summary, p-iii last sentence) the text states "Therefore, concentrations would be expected to stay the same or decrease without migration of cVOCs." While the Natural Attenuation Evaluation completed in November of 2006 (Appendix C) provides a compelling case that NA is occurring I don't think there is support for the statement.

Mr. Steven Hirsh  
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**Response:**

**The paragraph for Alternative 2 has been changed to state: "This alternative would rely on the one or more mechanisms to decrease and eliminate cVOCs. Land use controls (LUCs) to restrict the use of groundwater would be implemented until the RAO is achieved. Therefore this alternative is protective of human health and the environment and is expected to comply with applicable or relevant and appropriate requirements (ARARs)."**

If you questions or comments concerning these responses, please contact Mr. Paul Landin at (757) 671-6238.

Sincerely,

CH2M HILL

A handwritten signature in black ink, appearing to read "Paul Landin", written over the typed name "Paul Landin, P.E.".

Paul Landin, P.E.  
Project Manager

cc: Ms. Winoma Johnson, P.E./NAVFAC MIDLANT  
Mr. Eric Salopek/VDEQ  
Ms. Holly Rosnick/CH2M HILL  
Mr. Ed Corack/CH2M HILL  
Ms. Bonnie Capito/NAVFAC Atlantic