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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 10009, Richmond, Virginia 23240

Fax (804) 698-4500 TDD (804) 698-4021

www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

February 28, 2006

Winoma Johnson
Remedial Project Manager
Naval Facilities Engineering Command, Mid-Atlantic
9742 Maryland Avenue
Code EV3, Bldg N-26, Room 3208
Norfolk, VA 23511-3095

**Re: Draft Engineering Evaluation/Cost Analysis; Site 23 – Building LP-20 Plating Shop;
Naval Station Norfolk, Norfolk, VA**

Dear Ms. Johnson:

As you know, the Department of Environmental Quality's Office of Remediation Programs provided comments on the *Draft Engineering Evaluation/Cost Analysis; Site 23 – Building LP-20 Plating Shop (Draft EE/CA)* in a January 11, 2006 letter. Clarifications to the January 11, 2006 letter are provided below.

Previously, the LP-20 Plating Shop was undergoing closure pursuant to the Resource Conservation and Recovery Act (RCRA). The Department's Office of Waste Permitting indicated in an August 20, 2002 letter that the LP-20 Plating Shop was transferred to the CERCLA program. Therefore, the Department's Office of Remediation Programs has determined that the CERCLA remediation requirements will meet the RCRA closure performance standards of 40 CFR 265.111(a) and (b) and the RCRA Corrective Action requirements of 40 CFR 264.101(a) for Site 23 (previously known as the LP-20 Plating Shop).

In light of the above, additional revisions must be made to the *Draft EE/CA*. Specific comments are provided below.

1. 3.4, pages 3-2 through 3-3 – Please provide a discussion of the regulatory history of Site 23 citing the regulations and specific document(s) pertaining to the transfer of this unit from RCRA to CERCLA.

2. Appendix B, Table B-6 – Please include 40 CFR 265.111(a) and (b) and 40 CFR 264.101(a) as “applicable” requirements. The “comments” for these requirements should include a summary of the discussion provided for comment 1 above.

If you have questions concerning any of the above, please contact me at (804) 698-4131 or you may e-mail me at gweng@deq.virginia.gov.

Sincerely,



Garwin W. Eng
Environmental Engineer Senior
ORP, FFR

Attachment

- c: Todd M. Richardson – EPA Region III (3HS11)
Milton L. Johnston – TRO, DEQ
Durwood H. Willis – DEQ
Erica S. Dameron – DEQ
Naval Station Norfolk Correspondence File