

3/19/08-02104

Johnson, Winoma A CIV NAVFAC MidLant

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Sent: Wednesday, March 19, 2008 3:47 PM
To: Johnson, Winoma A CIV NAVFAC MidLant; Paul.Landin@CH2M.com;
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Hi Winoma,

EPA has completed its review of the draft "Focused Feasibility Study for Site 23 - Building LP-20 Plating Shop" dated December 2007. Comments below:

Executive Summary (Page II, middle of the page): "There are no significant failures of this alternative when compared against the NCP evaluation criteria." I think this is just an awkward way of saying that the recommended alternative meets the NCP evaluation criteria.

Subsurface Soil (Page 1-8, last paragraph in the section): "...some of the arsenic concentrations were below the background levels". I don't think this needs to be said, but if its left in I think you should expand on the work background (Site 23 background? Bldg LP 20 background? NSN background? At a you should cite the background study used for the comparison.

Summary of Risk Assessment Results: Did the risk assessment consider the potential for vapor intrusion? Is there anything we can say here about VI? Did the Removal Action mitigate the potential for VI in this portion of the building?

ARAR issue: As we have previously 'discussed', I do not think there are ARARs for this action. If Navy is in agreement several changes to the text become necessary. Changes are needed in 3.2, Detailed and Comparative Analysis of Remedial Alternatives, 4.1 Comparison of Remedial Alternatives (Table 4.1), 4.1.2 Compliance with ARARs, Section 5, Recommended Alternative, Table A-1, Federal Chemical Specific ARARs.

Thank you for the opportunity to review this document. Please contact me if you have any questions.
Steve

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