Staszak, Janna/VBO

From: Lukens.Elizabeth@epamail.epa.gov
Sent: Monday, May 17, 2010 5:30 PM
To: Staszak, Janna/VBO
Cc: walt.j.bell@navy.mil
Subject: RE: SJCA Site 2 Proposed Plan - Responses to Legal Comments

Looks good, Janna! Great job!

Betsy

From: <Janna.Staszak@CH2M.com>
To: Elizabeth Lukens/R3/USEPA/US@EPA, <walt.j.bell@navy.mil>
Date: 05/17/2010 05:07 PM
Subject: RE: SJCA Site 2 Proposed Plan - Responses to Legal Comments

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Walt and Betsy, the revisions I'm sending to my designer are in the attached file. Let me know if you have any objections.\
The formal responses will follow.

From: Lukens.Elizabeth@epamail.epa.gov [mailto:Lukens.Elizabeth@epamail.epa.gov]
Sent: Monday, May 17, 2010 3:10 PM
To: Staszak, Janna/VBO
Cc: Jones, Adrienne/VBO; Landin, Cecilia/VBO; Karen.Doran@deq.virginia.gov; Stroud.Robert@epamail.epa.gov; walt.j.bell@navy.mil; Beach.Bruce@epamail.epa.gov
Subject: Re: SJCA Site 2 Proposed Plan - Responses to Legal Comments

Hi SJCA Team,

I have reviewed the RTC to EPA legal comments, and I also reviewed the draft pdf of the PRAP, though the one that was attached didn't actually show the revisions -- they could be viewed in most cases by putting my cursor over a little blue upside down "T." So I think I've seen all the revisions. I appreciate your feedback; the RTC was very thorough in explaining many of the issues I raised. I only have a few further comments.

My further comments are as follows:

1) In Section 5.1, the HHRA Summary, I still think that it is somewhat misleading and possibly irrelevant to list individual constituents and comment on the fact that they show no unacceptable CTE risks. I understand that the point of the analysis is to look at the impacts on target organs of any number of constituents which may impact those organs. I don't really see the point of breaking down the analysis into individual constituents, when those constituents may need to be summed (depending on how many constituents affect any given target organ). However, I am not a toxicologist, so I defer to the toxicologist's review.

2) Section 7, Tables 6 & 7: I still think it would be better to list the time to achieve RAOs and the costs of each alternative in one of these tables. I understand that the costs are provided and compared in Table 10, but that is so far removed from the description of the components of each alternative that the reader can't see, easily, what the cost is related to. Also, I don't see the time to achieve RAOs provided anywhere in the document. The only reference is in the third paragraph under Section 8.2, which only talks about the time to achieve RAOs for any given alternative relative to the other alternatives -- no time-frames are provided. The Relative Ranking Table presumably takes this factor into account in coming up with the ranking for short term effectiveness, but it's not specified.

3) Table 9: I found that the analysis as applied produced some odd results in this table. It still doesn't seem that No

Action should get a half circle for short-term effectiveness and only a quarter circle for implementability. Clearly, it's not effective at all, yet it's simple to "implement" since you don't have to do anything. Also, although all alternatives that survive the threshold analysis go forward, it is still possible and desirable to rank them according to their overall protectiveness. (If ARARs are all complied with, there is nothing to be gained by attempting to rank the alternatives under that criterion.)

4) Just a note going forward: When you do the ROD, please rank each alternative against each criterion as discussed in RTC comment 40 (re Section 8.2, 1st paragraph, last sentence).

5) Comment 46: Section 8.2, 4th paragraph, 3rd sentence: I think you may be confusing "reliability of the technology" with "effectiveness of the remedial alternative" in the discussion of Alternative 4. Just because the treatment area is smaller, that doesn't make the technology any less implementable. The fact that the treatment area is smaller may render the alternative less effective in cleaning up the site, but that is addressed by a different criterion.

6) Comment 51: Section 9, 3rd paragraph, second sentence: The LUC should be written as a specific prohibition (if that's what it is). The statement currently reads like an RAO, saying what will be prevented. The question remains, how will it be prevented. Prohibiting digging should not be a parenthetical; that's the LUC. Perhaps something like this: "LUCs will be implemented to prohibit digging or any other activity which would result in human contact with the waste and COCs in the soil and sediment."

7) Glossary definition of Admin Record: Please change "and is available for public review" to "which is available for public review."

Thank you,

Betsy

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From: <Janna.Staszak@CH2M.com>
To: Robert Stroud/R3/USEPA/US@EPA, <Karen.Doran@deq.virginia.gov>, <walt.j.bell@navy.mil>
Cc: <Adrienne.Jones@CH2M.com>, Elizabeth Lukens/R3/USEPA/US@EPA, <Cecilia.Landin@ch2m.com>
Date: 05/05/2010 08:47 AM
Subject: SJCA Site 2 Proposed Plan - Responses to Legal Comments

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Bob and Team,
Please see the attached RTC for the EPA legal comments provided last week. The marked up version of the Proposed Plan is also attached for your reference to see how the change are proposed (please note, there are a few changes that haven't been made but are instead included as directions to the editor; those changes will be made).

Please let us know as soon as possible if these responses are acceptable or if you have additional questions or concerns. Our public meeting is scheduled for May 18, so if we don't get the public notice out within the next day or so, we may need to cancel the meeting.

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From: Stroud.Robert@epamail.epa.gov [mailto:Stroud.Robert@epamail.epa.gov]
Sent: Tuesday, April 27, 2010 5:00 PM
To: Karen.Doran@deq.virginia.gov; Jones, Adrienne/VBO; Staszak, Janna/VBO; walt.j.bell@navy.mil
Subject: EPA comments SJCA Site 2 PRAP

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