

Responses to Comments
Draft Proposed Plan
Site 2: Waste Disposal Area B
St. Juliens Creek Annex
Chesapeake, Virginia

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Comments from EPA Legal, provided 27 April 2010

1. **Comment:** Section 1, 2nd sentence – Move “excavation” from after “soil cover” to before it.

Response: The requested revision has been made.

2. **Comment:** Section 2.1, 2nd paragraph, 1st sentence – Change “outlets” to “discharges”.

Response: The requested revision has been made.

3. **Comment:** Section 2.2, last sentence – Move location of Table 1 title to above the tables (Tables 1 and 2); First section of Table 2 needs a heading, “VOCs”?

Response: The titles of all of the tables and figures within the document have been moved from below the tables and figures to above. It is believed that EPA Legal may have reviewed an old version of the Proposed Plan, as there is a heading for Table 2 in the March 2010 pdf provided for legal review, while it was missing from the January 2010 pdf submitted for team review. However, because EPA provided comments in a Word file created from the March 2010 pdf distributed for legal review, it is not believed to be necessary to re-review the text. For an explanation of the changes between the team review and the current version, the responses to the team comments may be reviewed.

4. **Comment:** Section 3, 1st paragraph, 5th sentence – Change “outlets” to “discharges”.

Response: The requested revision has been made.

5. **Comment:** Section 3, 1st paragraph, last sentence – For Figure 4, language should reflect that it is, ingestion and inhalation “of” ...and dermal (or direct) contact “with” ...

Response: The text on Figure 4 has been revised to differentiate the “of”s and “with”s for ingestion, dermal contact, and direct contact.

6. **Comment:** Section 3.1, 4th paragraph, 2nd sentence, reference to SJS02-MW10D – Location?

Response: A reference to Figure 5 has been added to the end of the referenced sentence.

7. **Comment:** Section 3.1, 4th paragraph – See comment in Section 3.3.

Response: See response to Comment 10.

8. **Comment:** Section 3.1, 6th paragraph, 4th sentence – Upstream or downstream of the highest concentrations in surface water?

Response: The referenced sentence has been revised as follows, “Elevated inorganics were detected in sediment across the tidal inlet, with the highest concentrations occurring within the central portion of the Site 2 inlet and in the vicinity of the surface water locations with the highest inorganic concentrations.”

9. **Comment:** Section 3.2, 4th bullet – Delete “additionally”.

Response: The requested revision has been made.

10. **Comment:** Section 3.3, 5th sentence - But highlighted paragraph in section 3.1 indicates that contaminants in Yorktown aquifer were probably caused by drilling well, and that they decreased below MCL upon subsequent sampling; Also conflicts with Section 4.

Response: Because TCE (the primary Columbia aquifer groundwater contaminant at Site 2) is denser than water, it sinks through the groundwater and pools on the Yorktown confining unit at the base of the surficial Columbia aquifer. DNAPL may be present at the bottom of the Columbia aquifer. However, the Yorktown confining unit appears to be continuous under the site and its low permeability prevents downward migration of DNAPL to the deeper aquifer, the Yorktown aquifer, is not occurring. Investigation activities demonstrated that the VOCs detected within Yorktown aquifer groundwater were carried down during well installation and have naturally attenuated. A reference to Figure 4 has been added to the last sentence of paragraph 2 in Section 3, which describes the relevant hydrogeologic units at Site 2. The 3rd sentence in Section 3.3 has been revised to read: “Therefore, DNAPL, if present at the bottom of the Columbia aquifer, could present...”, replacing “...at the top of the Yorktown confining unit...”.

11. **Comment:** Section 5.1, last sentence – Does this contradict the statement that there may be a DNAPL?

Response: See response to Comment 10.

12. **Comment:** Section 5.1, “Waste and Soil” section, 3rd sentence – Add “associated with exposure to site soils” after “levels”.

Response: The requested revision has been made.

13. **Comment:** Section 5.1, “Waste and Soil” section, 1st paragraph, 3rd sentence – What is the justification for relying on the CTE calculations for exposure risk?

Response: The referenced paragraph and Table 3 summarize both RME and CTE risks and hazards. Both RME and CTE risks and hazards were factored into the remedial decision for the site. No changes are proposed.

14. **Comment:** Table 3 Title – Does it refer to unacceptable risks only?

Response: The purpose of the table is to summarize unacceptable hazards in addition to unacceptable risks; however, because there are instances where there are unacceptable risks for a receptor where there are not unacceptable hazards (and vice versa), there are HIs shown on the table that are not unacceptable. The unacceptable HIs are shown bolded in the table and noted. The title has been revised to “Human Health Risk and Hazard Summary” to indicate unacceptable hazards are also provided on the table.

15. **Comment:** Section 5.1, “Waste and Soil” section, 2nd paragraph, last sentence – How did these (antimony, iron, and vanadium) enter the discussion? All implicated in future child resident exposure to soil. Explain in text.

Response: Antimony, iron, and vanadium were identified in the HHRA as posing potential unacceptable risks and included on Table 3. The text explains that lead was also identified as potentially posing risk but was not included in Table 3 because the risk is calculated differently and therefore not included on Table 3. Discussion of antimony, iron, and vanadium is not needed. Therefore, the referenced sentence has been revised as follows, “Therefore, in addition to waste remaining in place and the constituents summarized in Table 3, the HHRA identified potential risks associated with lead in soil.”

16. **Comment:** Section 5.1, “Shallow Groundwater” section, 1st sub-bullet under Arsenic – From arsenic alone? Is that relevant? Don’t we need to sum the risks to target organs?

Response: The bullet has been revised to state, “There is no unacceptable risk based on CTE.” The absence of unacceptable risk based on CTE is relevant for consideration with the other bullets. Arsenic was carried through the full HHRA and was therefore included in the sum of risks to target organs. Additional details are provided in the Expanded RI Report, which is contained in the Administrative Record.

17. **Comment:** Section 5.1, “Shallow Groundwater” section, 3rd sub-bullet under Arsenic, 2nd sentence – i.e., it was in the soil?

Response: The petroleum impacted area defined at the site is based on TPH detections in the subsurface soil, which were limited to samples located in the northern extent of the site, in the vicinity of monitoring well SJS02-MW09S. Elevated concentrations in arsenic were only detected in the shallow aquifer groundwater at one well, SJS02-MW09S, which is located adjacent to the identified petroleum impacted area. Most likely, degradation of the petroleum compounds in the soil has resulted in reducing conditions in this area, increasing the mobility of naturally occurring arsenic, and causing the elevated arsenic concentrations at SJS02-MW09S. The sentence has been revised as follows, “Elevated arsenic in the area of SJS02-MW09S, adjacent to the petroleum-contaminated area, has likely resulted from mobilization of naturally-occurring arsenic in soil by reducing conditions generated during degradation of petroleum compounds, as supported by field observations and measurements collected in the vicinity of this monitoring point.”

18. **Comment:** Section 5.1, “Shallow Groundwater” section, 1st sub-bullet under 2,6-dinitrotoluene – From 2,6 alone? Is that relevant? Don’t we need to sum the risks to target organs?

Response: The bullet has been revised to state, “There is no unacceptable risk based on CTE.” The absence of unacceptable risk based on CTE is relevant for consideration with the other bullet. 2,6-dinitrotoluene was carried through the full HHRA and was therefore

included in the sum of risks to target organs. Additional details are provided in the Expanded RI Report, which is contained in the Administrative Record.

19. **Comment:** Section 5.2, "Wildlife Receptors" section, Carbon Disulfide – Correct the spelling of "environment" and add a comma before and after "therefore" in the last sentence.

Response: The requested revisions have been made.

20. **Comment:** Section 5.2, "Wildlife Receptors" section, Arsenic, 1st bullet – For eco receptors?

Response: The first bullet under arsenic contains the ecological hazard quotient for aquatic receptors. Additionally, the text beginning with the second paragraph under "Wildlife receptors" through the end of the section has been moved to the end of the "Aquatic receptors" section, as all of the bullets refer to aquatic receptors.

21. **Comment:** Section 5.2, "Wildlife Receptors" section, Vanadium, 1st bullet – Eco HQ?

Response: Yes, the referenced HQ is the ecological HQ for aquatic receptors.

22. **Comment:** Section 6, 1st bullet under "Waste, soil, and sediment"- Replace the bullet with "Prevent direct human and ecological receptor contact with contaminants at concentrations that pose unacceptable risks"

Response: The requested revision has been made.

23. **Comment:** Section 6, 4th bullet under "Shallow Groundwater": The LUCs are the remedy which accomplishes the goal of preventing residential use of groundwater. The RAO is simply to prevent the human exposure to contaminants in groundwater. Divide the one bullet into two: "Reduce chlorinated VOC concentrations in shallow groundwater to the maximum extent practicable" and "Prevent human exposure to contaminants in groundwater <delete maintain LUCs> until concentrations allow for unlimited use and unrestricted exposure"

Response: The requested revision has been made.

24. **Comment:** Section 6, bullet under "Surface Water" - The surface water RAO is redundant.

Response: Because potential risk was identified in surface water during the Remedial Investigation, this RAO is necessary to ensure that the risk is addressed.

25. **Comment:** Table 4 - It would be good to indicate the source of PRG in the Table, i.e., MCLs, RBCs, etc.

Response: The source of the human health PRGs has been added to Table 4.

26. **Comment:** Section 6, "Surface Water", 1st paragraph, 1st and 2nd sentences – "Contaminants" are referenced in RAOs. Change ("constituents") here?

Response: The requested revisions have been made.

27. **Comment:** Section 6.1, first and third sentences - Insert "the" before "background".

Response: The requested revision has been made.

28. **Comment:** Section 6.1, third sentences: Have they done site-specific background studies?

Response: Facility-specific background studies have been conducted for soil and groundwater. A summary of the studies has been added to Table 1.

29. **Comment:** Section 6.1, fourth sentence: Insert “EPA policy and” after “industrial water supply,” and change “requires” to “require”.

Response: The sentence has been revised to the following: “Although the Columbia aquifer is not currently and is not expected to be used as a potable or industrial water supply, MCLs were used for the establishment of the PRGs to meet the Commonwealth of Virginia’s and EPA’s expectation to return usable groundwater to their beneficial uses wherever practicable.” The revision was agreed upon during resolution of comments on the Site 21 Record of Decision.

30. **Comment:** Section 6.2, second sentence: Why would the site-specific sediment bioassay result be a PRG? Is there sediment background information?

Response: The outcomes of the sediment bioassays were used to identify chemical concentrations in Site 2 sediments that are protective of benthic organisms. Bioassays provide one of the most accurate indicators of the potential for adverse effects to benthic-dwelling organisms because the outcomes directly quantify the toxicity of chemicals residing in sediment, and accurately account for bioavailability and the cumulative/antagonistic effects of chemicals in sediment. Bioassays accordingly provide an important line of evidence when evaluating the potential for adverse effects to benthic-dwelling organisms from the presence of chemicals in sediment. “Bioassay” has been bolded and the following definition has been added to the glossary: “A measurement of the effects of one or more chemicals on a living organism.” A background investigation was conducted at the facility and resulted in the establishment of soil background 95 percent UTLs for five soil types present at the facility. The 95 percent background UTLs for bohicket soil were used to develop PRGs for the Site 2 sediment. These UTLs were used because the sediment within the inlet is classified as the bohicket soil type. The background investigations have been added to Table 1.

31. **Comment:** Section 7, Tables 6 and 7 - Tables 6 and 7 are a good way to show the comparison. However, they don’t show time to implement/achieve RAOs or cost; make a groundwater column for Table 6 (the asterisk at the bottom should be its own column).

Response: Although Tables 6 and 7 present the components that make up each of the alternatives, they are not intended to present a comparison of the benefits or drawbacks of the alternatives. The comparison with respect to the time to implement/achieve RAOs and cost is included in the text and tables of Section 9, Evaluation of Criteria. Therefore, Tables 6 and 7 will not be modified to include time to implement/achieve RAOs or cost. Remediation areas were established to address potential human health and ecological risks associated with waste, soil, sediment, and shallow groundwater, based on the sample locations exceeding the PRGs. The shallow groundwater remediation area was divided into four remedial action target areas (high-concentration target area, low-concentration target area, naphthalene target area, and heptachlor epoxide target area) to support future development of remedial alternatives. Therefore, the addition of a groundwater column to Table 6 might cause confusion, as groundwater is already being addressed by the four

groundwater remedial target area columns in the table. Instead, “and LUCs” has been added to the appropriate groundwater remedial action target area columns.

32. **Comment:** *Table 7.* Combine the two ERD rows in Table 7? Also combine the two MNA rows in Table 7?

Response: The requested revision has been made. The ERD row has been revised to list the component as “ERD (high-concentration target area/low-concentration target area)” and the details for ERD have been revised to “Inject a substrate to create reducing conditions and produce electron donors to directly treat the high-concentration target area or low-concentration target area, depending on remedial alternative, through ERD of chlorinated VOCs.” The MNA row has been revised to list the component as “MNA (high-concentration target area/low-concentration target area)” and the details for MNA have been revised to “Allow chlorinated VOCs in the high-concentration target area or low-concentration target area, depending on remedial alternative, to break down naturally over time and implement a monitoring plan to confirm the continued breakdown.”

33. **Comment:** *Figure 6.* Legend for Figure 6 is too small to read.

Response: The legend for the figure has been enlarged.

34. **Comment:** *Section 8, first sentence.* Insert “the” before “alternatives”.

Response: The requested revision has been made.

35. **Comment:** *Section 8.2 and Table 9 -*

- a. “Present-worth cost” is never given in the text – need to include in Alternatives description.
- b. Why does No Action get a half circle for Short-term effectiveness? It never achieves RAOs, which is a consideration under that criterion.
- c. On the other hand, why does No Action only get a quarter circle for Implementability? It takes no effort to implement.
- d. Why do Alternatives 3 & 6 only get half circles for Long-Term Effectiveness & Permanence? Why would they be less effective than MNA alone?
- e. Why do Alternatives 6 & 8 only get quarter circles for Reduction in Toxicity, Mobility, etc.? Is that because the cleanup area for ERD is smaller?
- f. Are Alternatives 2 through 8 really all high achievers for both Overall Protection and Compliance with ARARs?

Response: The comparative evaluation of the alternatives was performed in the FS by dividing each of the NCP criteria into their sub-criteria. A qualitative comparative analysis for each sub-criterion was employed using a ranking system of 1 to 10. The results of this analysis were used to develop the ranking in Table 9 and a summary of the rationale for the ranking is provided in Section 8.2 of the PP. The detailed analysis was not included in the PP based on the objective to not over-complicate the document for public review; however, the Feasibility Study is available to the public through the Administrative Record if additional details are required. Table 9 has been moved down in the text so that the reader

begins to read the summary of the comparison for each of the criterion prior to looking at the table.

- a. The present worth cost of the alternative is discussed in the last paragraph of Section 8.2. Due to the high number of alternatives, the present worth cost for all alternatives was not provided in the text but instead presented in Table 10, which summarizes the costs of each alternative, and is referenced in the paragraph.
- b. The No Action alternative received half a circle for *Short-Term Effectiveness* because the low score it received for the *Time until Remedial Action Objectives are Achieved* sub-criterion was offset by the high scores it received for the *Protection of Community during Remedial Actions*, *Protection of Workers during Remedial Actions*, and *Environmental Impacts* sub-criteria.
- c. The No Action alternative received only a quarter circle for *Implementability* because the high scores it received for the *Ability to Construct and Operate the Technology*; *Ease of Undertaking Additional Remedial Actions, if Necessary*; *Availability of Offsite Treatment, Storage, and Disposal Services and Capacity*; *Availability of Necessary Equipment and Specialists*; and *Availability of Prospective Technologies* sub-criteria were offset by the low scores it received for the *Reliability of the Technology*, *Ability to Monitor Effectiveness of Remedy*, and *Ability to Coordinate and Obtain Approvals from Other Agencies*.
- d. Alternatives 3 and 6 received only a half circles for *Long-Term Effectiveness & Permanence* because they received lower scores than Alternatives 2, 4, 5, 7, and 8 for the *Adequacy and Reliability of Controls* sub-criterion because they have a lower level of confidence due to their reliance on containment, the potential for failure over time, and the need for replacement or maintenance. The controls associated with MNA are considered to be more reliable than those associated with Alternatives 3 and 6 MNA is not expected to generate as high concentrations of the daughter products as quickly as the ERD alternatives.
- e. Alternatives 6 and 8 received only quarter circles for *Reduction in Toxicity, Mobility, and Volume through Treatment* because, although an active remedy is used to address the high-concentration target area in Alternative 6, it relies on groundwater flow to passively direct groundwater in the high-concentration target area through the gate for treatment; and Alternative 8 includes active treatment in only the low-concentration target area.
- f. Because the Overall Protection of Human Health and the Environment and Compliance with ARARs criteria are *threshold criteria* that must be achieved by the alternatives being considered for the remedial action, the scores for those criteria were assigned based on “meets” or “does not meet” the criteria (either a “1” for does not meet or a “10” for meets”). Therefore, Alternatives 2 through 8 all received a high score of “10” for these criteria.

36. *Comment: Section 8.1 heading: Insert “Overall Protection of Human Health and the Environment; and Compliance with ARARs*

Response: Subsections for Overall Protection of Human Health and the Environment and Compliance with Applicable or Relevant and Appropriate Requirements have been added under the Section 8.1 heading.

37. *Comment:* Section 8.2 – Add criteria as subheadings before their respective paragraphs or bold the criteria in the paragraphs.

Response: The requested revision has been made.

38. *Comment:* Section 8.2, 1st paragraph, 1st sentence – Revise the sentence to read, “Alternatives 2 through 8 are all expected to achieve long-term effectiveness and permanence once RAOs are met.”

Response: The requested revision has been made.

39. *Comment:* Needs more discussion of the major ARARs; should rank alternatives as to their effectiveness vis-à-vis each criterion.

Response: A detailed discussion of the ARARs has not been added because there are no key ARARs that distinguish one alternative from the others. Additionally, none of the alternatives require an ARARs waiver. “Therefore, key ARARs do not distinguish one alternative from another.” has been added to the end of the ARARs section.

40. *Comment:* Section 8.2, 1st paragraph, last sentence; Ranking? 8,7,5,4,2,6,3?

Response: Yes, Alternatives 8 and 7 have the highest long-term effectiveness, Alternatives 5, 4, and 2 have slightly lower long-term effectiveness, Alternatives 6 and 3 have lower long-term effectiveness, and Alternative 1 is not long-term effective; as described in the text and depicted in Table 9.

41. *Comment:* Section 8.2, 2nd paragraph, 2nd sentence; Add “in” after “treatment” and add commas before and after “therefore”.

Response: The requested revisions have been made.

42. *Comment:* Section 8.2, 3rd paragraph, 1st sentence – Delete Alternative 1 from the first two sentences.

Response: The requested revision has been made.

43. *Comment:* Section 8.2, 3rd paragraph, 5th sentence –Add “having” after the first “of”.

Response: The requested revision has been made.

44. *Comment:* Section 8.2, 3rd paragraph, 6th sentence –Add “they are” after “however,”.

Response: The requested revision has been made.

45. *Comment:* Section 8.2, 4th paragraph, 1st sentence – What about 2? Isn’t that easier to implement?

Response: Alternative 2 received a slightly lower implementability score than Alternatives 4 and 5. Section 300.430(e)(9)(iii)(F)(1) of the NCP identifies “Technical feasibility, including...the reliability of the technology ...” as a criterion for assessing the

implementability of an alternative. Because there is no guarantee that the natural degradation of COCs will continue over time, and unlike ERD, there are no measures under MNA that can be taken to maintain the operation of this technology (i.e., additional ERD injections), MNA alone is considered to be less reliable. No changes to the document are proposed.

46. **Comment:** *Section 8.2, 4th paragraph, 3rd sentence* - Wouldn't this make it EASIER to implement?

Response: Because Alternative 4 has a smaller treatment area than Alternative 5, its implementability scored slightly lower based on a lower "reliability of the technology."

47. **Comment:** *Section 8.2, 4th paragraph, 4th sentence* - This is not the point of this criterion. "Implementability" is the ease of implementation, considering both "ease of construction" and availability of materials. The timeframe to achieve RAOs is addressed by Short-Term Effectiveness, and whether the technology is reliable is addressed by Overall Protection and also Long-term Effectiveness.

Response: See response to Comment 45. The last part of the sentence, "and will take longer to achieve RAOs" has been deleted.

48. **Comment:** *Section 8.2, 4th paragraph, 6th sentence* - This is not the point of this criterion. Implementability does not really address proven effectiveness.

Response: See response to Comment 45.

49. **Comment:** *Section 8.3 heading:* Add "State and Community Acceptance" to the header.

Response: The requested revision has been made.

50. **Comment:** *Section 9, 1st paragraph, 1st sentence;* Change the figure referenced to Figure 7.

Response: The requested revision has been made.

51. **Comment:** *Section 9, third paragraph, second sentence* - Need to specify what they will prohibit/restrict.

Response: The sentence has been revised to the following: "LUCs, including institutional controls and cover inspections, will be implemented and maintained to prevent human contact (i.e., digging into) with waste and COCs in soil and sediment."

52. **Comment:** *Section 9, 4th paragraph, last sentence* - Add "and may change" after reevaluated.

Response: The requested revision has been made.

53. **Comment:** *Section 10, 3rd sentence* - Change "is" to "runs".

Response: The requested revision has been made. Additionally, the dates have been updated based on the current schedule.

54. **Comment:** *Section 10, last sentence* - Add "see page 1" in parentheses at the end of the sentence.

Response: The requested revision has been made.

55. **Comment:** *Glossary of Terms, "Administrative Record"* - This sounds like "information repository"; AR is more specific. Revise the definition to read, "A compilation of site-related information, which was reviewed or relied on in the selection of a regulatory action, for public review."

Response: The definition has been changed to, "A compilation of site-related information reviewed or relied upon by the Navy and regulatory agencies to make decisions about the site and its cleanup, and is available for public review." The wording is consistent with the Community Involvement Plan and is believed to be more public-friendly than the proposed change

56. **Comment:** *Glossary of Terms, "Applicable or Relevant and Appropriate Requirements (ARARs)"* - Revise the definition to read, "The federal or state environmental rules and regulations which are applicable or relevant and appropriate to activities conducted, specific environments, or contaminants found at a CERCLA site."

Response: The requested revision has been made.

57. **Comment:** *Glossary of Terms, "Background", 1st sentence* - Add "either" after "as".

Response: The requested revision has been made.

58. **Comment:** *Glossary of Terms, "Cancer Risk", 1st sentence* - Add "specific" after "to".

Response: The requested revision has been made.

59. **Comment:** *Glossary of Terms, "Cancer Risk", 2nd sentence* - Set up from lowest risk to highest risk. Revise the sentence to read, "For example, EPA's acceptable risk range for Superfund sites is 1×10^{-6} to 1×10^{-4} , meaning there is 1 additional chance in 1 million (1×10^{-6}) to 1 additional chance in 10,000 (1×10^{-4}) that a person will develop cancer if exposed to a site that is not remediated".

Response: The requested revision has been made.

60. **Comment:** *Glossary of Terms, "Ecological Risk Assessment"* - Change "the environment" to "ecological receptors".

Response: The requested revision has been made.

61. **Comment:** *Glossary of Terms, "Enhanced Reductive Dechlorination"* - Correct the spelling of "dechlorination" in the glossary term listing.

Response: The requested revision has been made.

62. **Comment:** *Glossary of Terms, "Enhanced Reductive Dechlorination"* - Change "and" to "in order to".

Response: The requested revision has been made.

63. **Comment:** *Glossary of Terms, "Feasibility Study"* - Add "range of" after "a" and make "proposal" plural.

Response: The requested revisions have been made.

64. *Comment: Glossary of Terms, "Hazard Index" – Sum of HQs?*

Response: The definition has been revised as follows, "A summation of the hazard quotients for all chemicals to which an individual is exposed. The HI is indicative of non-cancer health effects and is a ratio of the existing level of exposure to an acceptable level of exposure. A value equal to or less than 1 indicates that the human population is not likely to experience adverse effects."

65. *Comment: Glossary of Terms, "Hazard Quotient" – Indicate relationship between HI and HQ.*

Response: The relationship between HI and HQ has been incorporated into the definition of Hazard Index (see response to Comment 65).

66. *Comment: Glossary of Terms, "Land Use Controls" – Change "limits" to "limit".*

Response: The requested revision has been made.

67. *Comment: Glossary of Terms, "Munitions and Explosives of Concern" – Delete "A", capitalize "military", and make "explosive" plural.*

Response: The requested revision has been made.

68. *Comment: Glossary of Terms, "National Oil and Hazardous Substances Pollution and Contingency Plan" – Add "A plan codified at 40 CFR Part 300 that" to the beginning of the sentence and uncapitalize "Provides".*

Response: The requested revision has been made.

69. *Comment: Glossary of Terms, "Non-cancer Hazard" – Add the following sentence as the first sentence, "Adverse human health effects other than cancer which are caused by contaminants present at a site."*

Response: The requested revision has been made.

70. *Comment: Glossary of Terms, "Poly-cyclic Aromatic Hydrocarbon" – Change "consists" to "consist".*

Response: The requested revision has been made.

71. *Comment: Glossary of Terms, "Polychlorinated Biphenyl" – "restricted" or prohibited"?*

Response: "Restricted" has been replaced with "regulated." While the new use of PCBs in commerce is prohibited, this prohibition is not universal to all uses. For example, PCBs were banned from use in caulk after 1978. However, existing caulk that contains PCBs and that was applied prior to the ban is not currently prohibited for use.

72. *Comment: Glossary of Terms, "Proposed Plan" – Revise to read, "A document that presents the rationale for proposing a cleanup alternative and requests public input regarding the proposed cleanup alternative."*

Response: The requested revision has been made.

73. *Comment: Glossary of Terms, "Receptor" – Add "A" before "Humans", uncapitalize "Humans", and make "humans", "animals", and "plants" singular.*

Response: The requested revision has been made.

74. **Comment:** *Glossary of Terms, "Remedial Action Objectives"* – Add "Cleanup" before "Objectives", uncapitalize "Objectives", and add "for a site" after "Objectives".

Response: The requested revision has been made.

75. **Comment:** *Glossary of Terms, "Remedial Investigation", 1st sentence* – Move "where hazardous substances have been disposed or released" to after "A study of a facility".

Response: The requested revision has been made.

76. **Comment:** *Glossary of Terms, "Site"* – Delete "of the facility".

Response: The requested revision has been made.