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Comments on the Applicable or Relevant and Appropriate Requirements (ARARs) of the
Draft Final Engineering Evaluation/Cost Analysis
For Site 5 Waste/Burnt Soil Area and Impacted Surface Soil and
Sediment Areas
St. Juliens Creek Annex, Chesapeake, Virginia
Dated October 2006

General Comment

This document contains the ARARs information in the Appendix C. It appears that the state ARARs which are applicable or relevant and appropriate have been identified and correctly cited.

In Sections 4.1 and 4.2, Action-specific ARARs related to the removal action should also be generally referred to in the text discussion of the alternatives. For example, Alternative 3, should reference Erosion and Sediment Control regulations. Alternative 4, this may include requirements under the Virginia Wetlands Protection Permit program although at NPL sites permits are not required.