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Subject: EPA response to the RTC's
Attachments: Site 21 Response to RTC's.doc

Attached are EPA's response to the RTC's.

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**EPA Comments
Site 21 Feasibility Study
St. Juliens Creek Annex
Chesapeake, Virginia**

EPA General Response Comments: EPA is concerned with arsenic not being included as a COC and only monitored during the RD. Although the cumulative MCL risk from VC and TCE are within the risk range, the mobilization of arsenic will undoubtedly occur during the active remedy at Site 21. Thus, the addition of arsenic may cumulatively present additional carcinogenic risk outside of the acceptable risk range. By not including arsenic, the cumulative carcinogenic risk contributed by arsenic is not being accounted and thus carcinogenic risk contributed by arsenic would remain in the site groundwater.