

Responses to Comments  
Draft Interim Proposed Plan  
Site 21: Industrial Area  
St. Juliens Creek Annex  
Chesapeake, Virginia

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**Comments from EPA Tox and Legal, provided 10 April 2009**

1. **Legal Comment: Figure 1, Site Location.** A larger regional map would be helpful.

**Response:** Figure 1 has been replaced with a larger regional map (see attached figure), which shows the location of the surrounding cities of Chesapeake and Portsmouth, as well as the location of Site 21 relative to SJCA.
2. **Legal Comment: Section 2.2 Summary of Previous Investigations, 1<sup>st</sup> paragraph.** Additionally, please state that this information is available in the information repository (if this is correct).

**Response:** The requested revision will be made.
3. **Legal Comment: Section 3.2 Fate and Transport of Contamination, 1<sup>st</sup> sentence.** Please change "are composed of" to "include".

**Response:** The suggested revision has been made.
4. **Legal Comment: Section 4 Scope and Role of Response Action, 2<sup>nd</sup> sentence.** "three sites have a Final". Please remove "a".

**Response:** The suggested revision has been made.
5. **Legal Comment: Section 4 Scope and Role of Response Action, "CERCLA RI/FSs"** these are generally just cited as "RI/FSs".

**Response:** The sentence has been revised to read as follows, "In addition to Site 21, two sites (Sites 2 and 5) are currently in the RI/FS phase of the CERCLA process." See response to Comment 2 for VDEQ below.

6. **Legal Comment: Section 5 Summary of Site Risks, Shallow Groundwater 1<sup>st</sup> paragraph.** Please change “target” to “acceptable”.

**Response:** The suggested revision has been made.

7. **Legal Comment: Section 8 Evaluation of Alternatives. Alternative 1.** “does not comply with the applicable or relevant and appropriate requirements (ARARs). Please remove as only actions trigger ARARs.

**Response:** The suggested revision has been made.

8. **Legal Comment: Section 8.2 Primary Balancing Criteria.** Please speak to the community impact of in situ injections.

**Response:** The following sentence was added to Section 8.2, Short Term Effectiveness, to describe the potential impact of in situ injections to the community, “The community impact associated with Alternatives 3 and 4 is slightly higher than Alternative 2 because of the vehicle traffic through the community associated with transportation of injection materials and investigative derived waste.”

9. **Legal Comment: Section 8.3 Modifying Criteria, Community Acceptance. 1<sup>st</sup> word.** Please change “these” to “this”.

**Response:** The suggested revision has been made.

10. **Legal Comment: Table 6. Alternative 1, compliance with ARARs.** Please change to N/A

**Response:** The suggested revision has been made.

11. **Legal Comment: Table 6. Alternative 2 MNA, Reduction in Toxicity, mobility, or volume through Treatment:** Please change to low as no treatment doesn’t satisfy the criterion.

**Response:** The suggested revision has been made.

12. **Legal Comment: Section 9 Preferred Alternative, 2<sup>nd</sup> paragraph 1<sup>st</sup> sentence.** Please remove the 1<sup>st</sup> comma and replace it with and. Additionally, please remove the 2<sup>nd</sup> comma.

**Response:** The requested revision has been applied to the first sentence of the third paragraph of Section 9, “Long term monitoring will be conducted to evaluate the effectiveness of ISCR and ERD and changes in the concentration and location of the plume.” Please confirm the revision satisfies EPA’s intent.

13. **Legal Comment: Glossary, Hazard Index.** Please revise population.

**Response:** The word “population” has been revised. Please see response to EPA Comment 5.

14. *Legal Comment: Glossary, Potable.* Please remove “Any liquid that is”.

**Response:** The suggested revision has been made.

15. *Legal Comment: Glossary, Site.* Please change to “or has otherwise” (add has).

**Response:** The suggested revision has been made.