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U S NAVY RESPONSE TO U S EPA COMMENTS ON DRAFT ENGINEERING
EVALUATION/COST ANALYSIS FOR SOIL HOTSPOT REMOVAL AREA OF CONCERN 7
(AOC 7) CHEATHAM ANNEX FISC WILLIAMSBURG VA
12/24/2013
U S NAVY

Response to Comments

Draft AOC 7 Engineering Evaluation/Cost Analysis for Soil Hotspot Removal

Naval Weapons Station Yorktown Cheatham Annex
Williamsburg, VA
December 24, 2013

The comment below was received via a letter dated December 3, 2013 from Gerald Hoover, USEPA, Region III. The Navy's response follows the comment.

EPA Comment: Page 4-2, Section 4.1.2.1 Drum Disposal Area Hot Spot: The text indicates "...clean topsoil..." would be used to backfill this area. EPA requests that prior to implementation of the Removal Action, the Navy provide EPA with information on the fill material to be used, including sampling data. EPA recommends the use of the Region 3 BTAG Backfill Values as a tool for screening backfill material.

Navy Response: Based on recent EPA and Navy discussions regarding fill material, the CAX Partnering Team will develop and agree on a plan for certifying fill materials are clean prior to their use at a site. This approach will apply for the AOC 7 soil removal, as well as, any future CAX removals where imported backfill materials are necessary. The removal contractor will incorporate this approach into their workplan, which will be subject to Team review and approval. No change to the EE/CA text is necessary. The Navy recommends continuation with preparation of the draft final AOC 7 EE/CA in anticipation of the upcoming 30-day public review period.