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DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
4911 SOUTH BROAD STREET
PHILADELPHIA, PA 19112-1303

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May 17, 2006

Ms. Lisa Bradford (3HS11), Remedial Project Manager
U.S. EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

SUBJECT: DRAFT RECORD OF DECISION (ROD) FOR SITE 1 - PRIVET ROAD COMPOUND SOIL (OU 1), JANUARY 2005, NAVAL AIR STATION JOINT RESERVE BASE, WILLOW GROVE, PA

Dear Ms. Bradford:

The Navy's responses to EPA comments on the subject draft No Further Action ROD are provided as enclosure (1). Based on these comments and responses, the document will be revised and a Draft Final version submitted for further consideration.

If you have any questions, please do not hesitate to contact Mr. Curt Frye at (215) 897-4914.

Sincerely,

Robert F. LEWANDOWSKI, P.E.
By direction of BRAC PMO

Encl:
(1) Navy Responses to Comments from USEPA Region III on the Draft Record of Decision (ROD) for Site 1 - Privet Road Compound Soil (OU 1), JAN 2005 (EPA Comments dated February 15, 2006)

Copy to:
J. Edmond, NASJRB Willow Grove
C. Frye, EFA Northeast (c/o BRAC PMO NE)
A. Flipsie, PADEP
R. Turner, TtNUS

NAVY RESPONSE TO EPA COMMENTS
DRAFT RECORD OF DECISION (ROD)
FOR SITE 1 – PRIVET ROAD COMPOUND
SOIL (OU 1), January 2005

(EPA Comments dated February 15, 2005)

General Comment: I have reviewed the draft ROD for the above Site and have several comments. I have made the suggested changes in an electronic copy of the document.

General Response: The Draft ROD from January 2005 with Robin Eisman (Assistant EPA Regional Counsel) revisions has been adopted for further revision/editing.

Specific Comments:

1. *Comment 1: page I-1, par. III. – As this is a NFA ROD, this section is not necessary. See A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Documents, p. 8-7, Highlight 8-6 (ROD Guidance).*

   Response: Concur. Previous Part I, Section III has been deleted. Following Sections have been renumbered accordingly.

2. *Comment 2: page I-2, par. V. – Referring to Highlight 8-6 in the ROD Guidance, the Statutory Determinations section in the Declaration is different than in a normal ROD. For example, mentioning compliance with federal and state ARARs is not necessary because there is no remedy to comply with the ARARs. Highlight 8-6 in the ROD Guidance states that:*

   "This Declaration should state that it has been determined that no remedial action is necessary at the site or operable unit. The Declaration should explain that previous response(s) at the site or operable unit eliminated the need to conduct further remedial action. This section should also note whether a five-year review is required based on the earlier response action(s). 'If a remedial action is selected that results in hazardous substance, pollutants, or contaminants remaining at the Site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after initiation of the selected remedial action' (NCP §300.430(f)(4)(ii))."

   Please make the appropriate changes to this section based on Highlight 8-6.

   Response: Concur. Made changes to Part I, Section IV.

3. *Comment 3: page II-1, Section II – It appears that there is a lot of information missing in this section. Normally, the section on Site History and Enforcement Activity goes into a little more depth on the past activities at the site. In particular, if there was a removal action, the ROD details the process leading up to removal action, as well as what the removal action accomplished and whether anything was left in place. In one sentence, this ROD lists all the different enforcement activities at the site, which normally would be described in 1-2 pages. The ROD should document what took place during each activity and why the next activity was initiated. Please elaborate on this section, taking time to describe the PA, SI, the removal action, etc.*

Response: Concur. Added discussion to Part II, Section II.

4. *Comment 4: page II-5, par. 1 – Please elaborate on the last sentence in this paragraph. When did the Navy perform a soil removal action? Did it remove all the waste? Did any sampling occur after the removal action to indicate that there was no further action needed? This needs to be documented in the Site History and Enforcement Activity Section.*

   Response: Concur. Added discussion to Part II, Section II.

5. *Comment 5: page II-5, par. 3 – Please add a sentence to the end of this paragraph stating that responses to any comments received during the comment period are included in the Responsiveness Summary, which is part of this ROD.*

   Response: Concur. Sentence added to Part II, Section III, Second Paragraph.

6. *Comment 6: page II-5, Section IV – When a ROD is written for an operable Unit, and not an entire site, it is important to convey the scope and role of the operable unit within the overall site management plan. This section of the decision summary should discuss how the operable unit or response action addressed by the ROD fits into the overall site strategy. This Scope and Role of Operable Unit or Response Action should describe the overall site cleanup strategy. See Highlight 6-8 and 6-9 of the ROD Guidance (page 6-9) for the format of this section.*

   Response: Concur. Part II, Section IV has been rewritten within the guidelines of the EPA ROD Guidance as suggested.

7. *Comment 7: Sections VII – XI – Please delete these sections. As this is a No Further Action ROD, Sections VII-XI, are not required. See ROD Guidance Highlight 8-6 (page 8-7).*

   Response: Concur. Sections have been deleted.

8. *Comment 8: Section XII – Please change this section to read: "The Proposed Plan for Site 1 Soil was released for public comment in October 2004. The Proposed Plan called for No Further Action for Site 1 Soil. The Navy reviewed all written and verbal comments submitted during the public comment period. It was determined that no significant changes to the remedy, as originally identified in the Proposed Plan, were necessary or appropriate." See ROD Guidance Highlight 6-38.*

   Response: Concur. Part II, Section XII has been rewritten as suggested.