Response to New York State Department of Environmental Conservation comments dated May 26, 2015 on the Remedial Investigation Addendum Soil, Groundwater, and Soil Vapor, Site 1, dated January 2015.

NYSDEC Comment	Navy Response
1. **Pages 6-1 thru 6-32, Section 6, Human Health Risk Assessment:** New York State does not use Risk-based corrective action to establish cleanup goals for any particular project. The cleanup criteria is established in 6 NYCRR Part 375 of New York State regulations. Therefore, neither the NYSDEC nor the NYSDOH will comment on this section other than the conclusions of this section will not be applied to any future screening of alternatives.	The Navy is conducting the activities at Site 1 under its CERCLA authority, which in part, requires assessment of risks to human health. 6 NYCRR Part 375 will be evaluated in the Feasibility Study as an Applicable or Relevant and Appropriate Requirement (ARAR).
2. Page 7-2, Section 7, No. 9: See comment 1 above.	The Navy is conducting the activities at Site 1 under its CERCLA authority, which in part, requires assessment of risks to human health. 6 NYCRR Part 375 will be evaluated in the Feasibility Study as an Applicable or Relevant and Appropriate Requirement (ARAR).
3. Page 7-3, Section 7, No. 11: The paragraph starts out stating that there are impacts to saturated soils at 8,100 µg/L [SIC] However, the section then goes on to state there are no residual PCB impacts to saturated soils.	The text in the report was incorrect. "Using a combination of current and historic data, there is no residual contaminated soil at the 2- to 15-foot interval, and the saturated soil interval." ", and the saturated soil interval" of the sentence will be deleted.
4. Page 7-4, Section 15: This section starts off stating there are no impacts from PCBs to the intermediate groundwater but then goes on to state there are concentrations of PCBs, though only slightly, above the MCL's. This paragraph goes on to state that there are definitive impacts to groundwater from sources north of Site 1 and the NWIRP when this has not been shown to be the case. The text needs to be revised accordingly.	To clarify the intent of this conclusion, it will be reworded as follow: "Generally, intermediate-depth groundwater sinks as it migrates to the south. PCBs were detected in all the intermediate-depth well, with concentrations ranging from approximately 0.3 to 0.5 µg/L along the northern edge of the former NWIRP, 0.5 to 3.4 µg/L north and south of Site 1 and Plant 3, and 0.3 to 2.7J µg/L along the southern edge of the former NWIRP. Based on the general increase in PCB concentrations across the facility, it appears that PCB-contaminated soil on the NWIRP, north of Site 1 and from Site 1 are contributing to the PCBs in groundwater that are migrating onto the NWIRP property from further north. The presence of contamination at the northern (upgradient) boundary of the facility, as well as other monitoring wells north of Site 1, provides evidence of an upgradient source(s)."

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NYSDEC Comment	Navy Response
5. Page 7-5, Sections 21 & 22: See comment 1 regarding the Human Health Risk Assessment.	The Navy is conducting the activities at Site 1 under its CERCLA authority, which in part, requires assessment of risks to human health. 6 NYCRR Part 375 will be evaluated in the Feasibility Study as an Applicable or Relevant and Appropriate Requirement (ARAR).
The NAVFAC-Midlant has already started preparing the feasibility study for Site 1 of Plant 3. Once the above comments are incorporated into the draft RI addendum, that report can be finalized. If you have any questions in the interim, please contact me at 518-402-9620.	This comment is acknowledged.

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