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NAS CECIL FIELD, FL
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LETTER REGARDING U S EPA REGION IV COMMENTS ON FINAL RESIDENTIAL DIG AND
HAUL PACKAGE FOR OPERABLE UNIT 10 (OU 10) SITE 21 NAS CECIL FIELD FL
4/25/2002
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

April 25, 2002

4WD/FFB

Commander Department of the Navy
SOUTHNAVFACENGCOM
Attn: Mark Davidson
Mail Code ES339
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: Final Residential Dig and Haul Package (April 2002)
Operable Unit 10, Site 21
Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document and concurs with the decision to excavate to residential clean up levels. However, the excavation must be completed as part of a Remedial Action or as a Removal Action. A Removal Action Memorandum was previously approved for this site to clean up to industrial levels. The action was completed in June 2001. Based on EPA's "Superfund Removal Procedures: Action Memorandum Guidance" (EPA-540-P-90-004, December 1990), page 30 states the following:

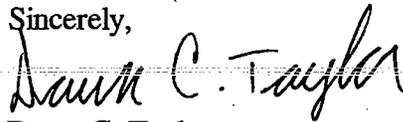
"Action Memos are occasionally required to continue work approved by an original Action Memo, or to restart work at the same site if the statutory limitation on time has been exceeded. The basic types of requests contained in these additional Action Memos are: 1) To extend a removal action beyond 12 months; 2) To increase the total project ceiling; 3) To increase the total project ceiling beyond \$2 million; and 4) To change the scope of response for the removal action." The text goes on to discuss general instructions for preparing these amended Action Memos.

Statement #4 applies to the current situation at Site 21, where a decision has been made to clean up to unrestricted use rather than industrial. The original action is not being changed (still excavation), but the scope of the response is being changed to be more protective. According to the EPA guidance, the original Action Memo may be amended to document this change.

The original Action Memo should be amended, prior to excavation, to reflect the change in the scope of the response. If it is expected that the 12-month statutory limitation on time will be exceeded, the amended Action Memo should also address that.

Should you have any questions, or if I may be of further assistance, please contact me by phone at (404) 562-8575 or by email at taylor.dawn@epa.gov.

Sincerely,



Dawn C. Taylor
Remedial Project Manager

cc: Scott Glass, SOUTHDIV
Mark Speranza, TTNUS
David Grabka, FDEP
Sam Ross, JA Jones