

N60200.AR.003484
NAS CECIL FIELD, FL
5090.3a

LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT PROPOSED PLAN FOR
OPERABLE UNIT 9 (OU 9) SITE 57 AND SITE 58 NAS CECIL FIELD FL

11/26/2002

U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

November 26, 2002

4WD/FFB

Commander
Department of the Navy
SOUTHNAVFACENGCOM
Attn: Scott Glass, Code ES3SG
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: Draft Proposed Plan for Operable Unit 9, Sites 57 and 58
Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Glass:

The U.S. Environmental Protection Agency has reviewed the subject report. For our review we utilized the "Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents", dated July 1999 (<http://www.epa.gov/superfund/resources/remedy.rods/index.htm>). Our comments follow:

1. Page 1, Site Description. The text needs to reference Figure 2 of the Proposed Plan where appropriate.
2. Page 1, Throughout the Proposed Plan (e.g. "About This Document", "Why is Cleanup Needed?", "A Closer Look at the BCT's Proposed Cleanup Plan", "What is a Formal Comment?", etc.) It indicates that the BCT proposes the alternative contained in the Proposed Plan. It may be better to State that the Navy, or the Navy and EPA, in consultation with FDEP, propose the alternative. Historically, we have used the term BCT in both Proposed Plans and in Records of Decisions because we have and do work as a team. However, the Proposed Plan should refer to the actual agencies involved.
3. Page 1, The Proposed Cleanup Plan. Recommend striking the words "more aggressive" because it is not known at present whether a more aggressive cleanup approach would, in fact, be the newly-implemented remedy. For instance, it may be just a different institutional control.
4. Page 1, Site Description. 2nd paragraph, 2nd sentence. Add a reference to Figure 3.
5. Page 1, Site Description. Add current and future land use to the site description. The current site description has past and future use. What is at the site now?
6. Page 1, Site Description. A statement should be added indicating that the current and future planned reuse for the site impacted the remedy selection.
7. Figure 2 of the Proposed Plan includes some information that needs to be explained on the figure. Specifically, the solid and dashed concentration contours need to be explained

- in terms of the contaminants represented, and the concentration units shown on the figure. An example of what is needed is presented on Figure 3.
8. Page 5, About This Document. Please add the following text after "...public's views and comments on the alternatives described: "The Navy and EPA in consultation with FDEP, may modify the Preferred Alternative or select another response action presented in this Plan based on new information or public comments. Therefore, the public is encouraged to review and comment on all alternatives presented in this Proposed Plan."
 9. Page 5, About This Document. Please provide the location of the Administrative Record.
 10. Page 5, Site History. Recommend changing "environmental history" in the first sentence of this section to "history of environmental investigation and remediation" since the text that follows discusses only investigation and cleanup activities.
 11. Page 5 and 6, Summary of Site Risks and Why is Cleanup Needed. Recommend adding a statement about any relevance of the floating product (as noted in the fourth "bullet" under Site History Section on page 5) to the need for remedial action of Site 57.
 12. Page 5, What do you think. When this does go final please change the year to the correct year.
 13. Page 5, Why is Clean-up Needed. Add a description of how this site and OU fit into the overall NAS Cecil Field strategy.
 14. Page 5, Summary of Site Risks. This section should be expanded to include a description of potentially exposed populations in current and future risk scenarios. What are the exposure pathways (e.g. direct ingestion of potable groundwater, exposure to soils, etc.). The Summary of Site Risks should link the site risks to the basis for action.
 15. Table 1. For non-Federal NPL sites, EPA has historically disagreed with the State of Florida about the relevance and appropriateness or applicability of Florida's groundwater cleanup target levels that are not based on either a valid risk assessment or drinking-water maximum contaminant levels (e.g xylene at a concentration of $20\mu\text{g/L}$). This comment is being provided for the BCT's information and for potential future discussion.
 16. Page 6, Clean-up Alternatives. Identify the preferred clean-up alternative at the beginning of this section.
 17. Page 6, Soil Clean-up Alternative, No Action. Add "No restrictions on the use of the property would be imposed."
 18. Page 6, Table 1. Provide the Federal MCLs as well as PRG's. If MCL's are not available, so state.
 19. Page 7, Groundwater Clean-up Alternatives, No Action. Suggest adding to the end of the paragraph "and no restriction would prevent access to groundwater contamination."
 20. Page 7, Groundwater Clean-up Alternatives, Limited Action, last sentence. "...health, additional **active** remedial measures..."
 21. Page 7, Site 58 Soil Cleanup Alternatives, Limited Action and Sites 57 and 58 Groundwater Cleanup Alternatives, Limited Action. Recommend changing the subtitle from "Limited Action" to Natural Attenuation. Institutional Controls and Monitoring." Also, fencing is not an institutional control but a land use control. Recommend changing first instance of "Institutional" to Land Use".
 22. Page 7, Sites 57 and 58 Groundwater Cleanup Alternatives, In-Situ Treatment. Recommend identifying the amounts of treatment media and number of injection points to be used as approximate rather than absolute values.

23. Page 7, Sites 57 and 58 Groundwater Cleanup Alternatives, Limited Action. Recommend deleting "active" from the last sentence. It may be interpreted to restrict the scope of the kind of additional measures in the event of remedy failure. For instance, the additional measures might be increased monitoring of institutional control, or a different institutional control that is proposed on the Preferred Alternative.
24. Page 7, Sites 57 and 58 Groundwater Cleanup Alternatives, Limited Action. Please clarify whether any drilling is allowed. This language limits the use of groundwater "for drinking purposes". Do you envision other groundwater uses to be allowed? If no use of the groundwater is to be allowed as well as drilling through the surficial to a deeper aquifer, please change the text.
25. Page 8, A Closer Look at the BCT's Proposed Cleanup Plan. Recommend changing the title to "Summary of Preferred Alternative" as recommended in the Guidance. There should be a reference back to the proposed alternatives. For instance, the text should state that Soil Alternative 3 is the Preferred Alternative for Soil, and Groundwater Alternative 2 is the Preferred Alternative for Groundwater.
26. Page 8, A Closer Look at The BCT's Proposed Cleanup Plan, 3 Long-Term Monitoring, point c. It is EPA's position that contaminant plume expansion that would already be indicated by monitoring of the "sentinel" wells would be a concern, regardless of what any plume modeling showed. The modeling would provide some additional basis upon which to develop, if necessary, a contingency remedy. Any contingency remedy would have to be at least evaluated for a case where the plume was clearly expanding into previously uncontaminated groundwater. The wording should be changed.
27. Page 8, A Closer Look at the BCT's Proposed Plan. Institutional Controls. This section should be expanded to include a description of purpose of the institutional control, type of institutional controls, how the controls will be implemented, who will be the responsible entity, and frequency of institutional control monitoring.
28. Page 13, Next Steps. The BCT does not review and sign the ROD. The Navy and EPA signs and reviews the ROD. Will the Navy or the BCT announce the decision. I believe it should be the Navy. The BCT is a partnership between three agencies, but it is the Navy, EPA and FDEP who will be doing the various reviews, announcements, signing, etc. Recommend replacing BCT with Navy and EPA where ever appropriate.
29. Page 13, Why Does the BCT Recommend this Proposed Plan. Recommend adding a fourth bullet: This alternative is recommended because it will achieve risk reduction by using natural attenuation for groundwater and by imposing restrictions on access to contaminated groundwater until clean-up goals are met.
30. Table 2, Summary of Comparative Analysis. Text of the table states that Alternative 2 for Soils will not comply with Chemical-Specific ARARs. Consistent with earlier comments sent regarding OU 11 Proposed Plan, this statement appears to be incorrect for two alternatives. Please verify. Are there chemical specific ARARs for soils? What are they? The Feasibility Study only showed 'to be considered' ARARs. Will the ARARs be met in the long term?
31. Table 3, Summary Comparative Analysis of Groundwater Cleanup Alternatives. Recommend striking "eventually" comply. Either the ARAR will or will not comply. Statute says "at the completion of the remedial action."
32. Table 3. The text should provide information on the length of time for ARARs to be met.

33. Table 2 and 3, Summary of Costs is appropriately broken down into capital, operation and maintenance and net present worth. However, with respect to the costs associated with soil and groundwater alternatives #2, are the costs presented truly representative?
34. Table 2 and 3 do not cover all nine criteria. Please add the analysis for State/Support Agency acceptance and Community acceptance. When was the Restoration Advisory Board briefed on this proposed plan?
35. Table 3. The description of Alternative 1 states that this alternative would not be protective for two reasons: migration of COCs would continue and that migration would remain undetected. If the Proposed Plan states unequivocally that migration of the COCs in the groundwater will continue for the no action alternative, then the same can be said for the monitored natural attenuation (MNA) alternative. Then, if protectiveness is defined by the absence of such migration, Alternative 2 is not protective. The table needs to be revised to precisely state if the alternatives are protective or not.
36. Table 3. Short-term effectiveness discussion of Alternative 1, the text should state that RAOs would never be confirmed, rather than stating they would never be achieved. Also, if RAOs will never be achieved for Alternative 1 then they never be achieved for Alternative 2.

Should you have any questions with regard to this letter, please contact me at 404/562-8539 or at vaughn-wright.debbie@epa.gov.

Sincerely,



Deborah A. Vaughn-Wright
Remedial Project Manager

cc: Mark Davidson, SOUTHDIV, Code ES339
David Grabka, FDEP
Mark Speranza, TTNUS
Paul Malewicki, J.A. Jones