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NAS CECIL FIELD, FL
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT PROPOSED PLAN FOR
OPERABLE UNIT 10 (OU 10) SITE 25 NAS CECIL FIELD FL
2/18/2003
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 18, 2003

4WD/FFB

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

Subject: Draft Proposed Plan for Operable Unit 10, Site 25
Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Davidson:

The NAS Cecil Field BCT has been in informal dispute awaiting resolution on issues pertaining to institutional controls and post Record of Decision (ROD) authority on the national level. For this reason, the Environmental Protection Agency (EPA) Region 4, has been unable to move forward with the draft Proposed Plan. Recent communications between the Department of Defense and EPA indicates that these issues have been resolved or are nearing resolution.

The Navy was provided comments to the draft proposed plan for OU 10, site 25, October 22, 2001. Based on recent negotiations between the Navy and EPA, revised comments on the draft proposed plan are being provided.

The OU 10, Site 25 Draft Proposed Plan was reviewed using 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, About This Document. Add a statement that the Proposed Plan is a document that the lead agency is required to issue to fulfill the requirement of CERCLA §117(a) and NCP §300.430(f)(2). Currently only CERCLA §117 is referenced.
2. Page 1, Site Description, 1st paragraph, 3rd sentence. "Transformer" should be plural.
3. Page 1, Site Description. Add a physical description of the site, especially any features which may impact remedy implementation.

4. 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?
5. Page 1, About This Document. Please add the following. "One of the purposes of this plan is to solicit the public's views.... described. The Navy 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."
6. Page 4, 1st column. The reader is referred to the Administrative Record. However, no address is provided. Later in the draft plan the reader is referred to the information repository. Since the Administrative Record can be found in the Information Repository, this should be made clear to the reader.
7. Page 4, What do you think? When this does go final please change the year to the correct year.
8. Page 4, Why is Clean-up Needed. Add a description of how this site and OU fit into the overall NAS Cecil Field strategy.
9. Page 5, A Closer Look at the BRAC Cleanup Team's Proposal. Add a #6 which address the standard statement which is now recommended for all Proposed Plans by EPA. "Based on information currently available, the Navy believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other criteria with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): (1) be protective of human health and the environment; (2) comply with ARARs; (3) be cost effective; (4) utilize permanent solutions to the maximum extent practicable; and (5) satisfy the preference for treatment as a principal element.
10. Page 5, 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.
11. Page 5, Summary of Site Risks. Need further detail on exposure pathways and targets; current and future use of groundwater.
12. Page 5, Summary of Site Risks. Add the standard statement "It is the BCT's judgement that the preferred alternative identified in this Proposed Plan is necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment."
13. Page 5, Summary of Site Risks, 3rd paragraph, last sentence. "Therefore, the soilwere

not evaluated for an ecological risk assessment.”

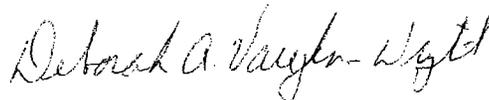
14. Page 5, Summary of Site Risks. This section should be expanded to include a description of potentially exposed populations in current and future risk scenarios. What are the exposure pathways (e.g. direct ingestion of potable groundwater, exposure to soils, etc.). The Summary of Site Risks should link the site risks to the basis for action.
15. Format: Recommend shifting the description of Groundwater Cleanup Alternatives to before the section titled “ A closer Look at the BRAC Cleanup Team’s Proposal”. This will help with the flow of the fact sheet/Proposed Plan.
16. Page 5, What are the Cleanup Objectives and Levels: Since the NCP requires using Maximum Contaminant Levels (MCL) when selecting cleanup goals, MCLs should also be provided in Table 1. If no MCLs are available, please so indicate.
17. Need to identify the ARARs evaluated. Reference to the Feasibility Study is not sufficient.
18. Page 6, Clean-up Alternatives. Identify the preferred clean-up alternative at the beginning of this section.
19. Page 6, Limited Action. Recommend changing the name of the alternatives from limited action to “Monitoring”.
20. Page 6, Groundwater Clean-up Alternatives, No Action. Suggest adding to the end of the paragraph “and no restriction would prevent access to groundwater contamination.”
21. Page 6, Groundwater Clean-up Alternatives, Limited Action, next to the last sentence. “...meet cleanup levels additional active remedial measures...”
22. Page 8, 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.
23. Page 8, Why Does the Navy 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.
24. Page 8, Why Does the BRAC Cleanup Team Recommend this Proposed Plan? Add a 4th bullet: Alternative 2, Natural Attenuation, Institutional Controls and monitoring is the preferred alternative. This alternative is recommended because it will achieve risk reduction by using natural attenuation for the groundwater and by providing safe

management of the remaining groundwater contamination until cleanup goals are met. This alternative costs less than other alternatives and reduces risk in an acceptable time frame.

25. Table 2 , The cost summary should be broken down into capital, operation and maintenance, construction, annual operations and net present worth.
26. Table 2 does 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?
27. Table 2, Community Acceptance. Add a statement that the Restoration Advisory Board has been briefed (July 2001).
28. Table 2, Nine Criteria. Provide a more detailed evaluation of the alternatives using the nine criteria. The current format is too general and does not provide sufficient information on how the alternatives meet or fail the nine criteria.
29. The Table of Acronyms is wasted space. Recommend substituting a "Glossary of Technical Terms" this basically would serve the same purpose and provide useful information for the public.

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: David Grabka, FDEP
Mark Speranza, TTNUS
Paul Malewicki, J.A. Jones