

N60200.AR.003672
NAS CECIL FIELD, FL
5090.3a

LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT EXPLANATION OF
SIGNIFICANT DIFFERENCES FOR MULTIPLE OPERABLE UNITS AND SITES NAS CECIL
FIELD FL
7/28/2003
U S EPA REGION IV

ESD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4



61 Forsyth Street
Atlanta, Georgia 30303-3104

JUL 28 2003

4WD/FFB

Commander
Department of the Navy
SOUTHNAVFACENCOM
Attn: Mark Davidson, Code ES33
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: Draft Declaration of the Explanation of Significant Differences, Naval Air Station
Cecil Field, Jacksonville, Florida

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject draft Explanation of Significant Differences (ESD). The document was very well prepared with only minor comments. Our comments follow:

1. Page 1, "Basis for the Document", first sentence, first paragraph: "Prior to Base closure in 1999, LUC provisions generally were not included in RODs."
2. Page 2, "Description of Significant Differences", first sentence, fourth paragraph: "The Navy will be responsible for implementing, inspecting, reporting, maintaining, and enforcing the LUCs described in this ESD in accordance with the LUC Remedial Design."
3. Page 3, "Description of Significant Differences", last sentence: "The will implement, report, maintain, monitor, and enforce the LUCs according to the LUC Remedial Design."
4. Table 1, OU 1: Add "Prohibit excavation, drilling, or otherwise disturbance of the vegetative cover."
5. Table 1, all OU's: "Prohibit Groundwater use for all purposes."
6. Table 1, OU2, site 5: "prohibit residential land use (If subsurface soils are not exposed) This point was agreed upon by the BCT several years ago. Residential development would be permitted in this area as long as subsurface soils (≥ 2 feet) were not exposed. Subsurface soil contamination may still exists above Florida's Soil Target Cleanup levels. Now that we are approaching possible transfer of this site, the BCT should begin to discuss the best means of enforcement and maintaining this restriction. The current reuse plan does not show any planned development for site 5, however, over time that may change. The Land Use Control Remedial Design for this site should detail how this restriction to be maintained and enforced. Also, because it has been several years since the soils were last sampled it is suggested that the subsurface soils be resampled to determine if a restriction is even still warranted

7. Table 1, OU2, site 5; OU2, site 17; OU3, site 8: "Prohibit disturbance of monitoring wells ~~remediation systems~~. Currently, these three sites do not have an active remediation system in place. The remedial action underway is long term monitoring and monitored natural attenuation. It is recommended that the restrictions also prohibit disturbance of remediation systems in the event that future reviews of the remedial action indicates that a treatment system is required.
8. Table 1, OU8, site 3: Add "Prohibit residential use."
9. Table 9, sites 36 & 37: Add "Prohibit breaching of storm sewer line."

Thank you for the opportunity to review the draft ESD. If you have any questions please contact me at 404/562-8539 or at vaughn-wright.debbie@epa.gov.

Sincerely,



Deborah A. Vaughn-Wright
Remedial Project Manager
Federal Facilities Branch

cc: David Grabka, FDEP
Mark Speranza, TTNUS
Mike Halil, J.A. Jones
Jeff Meyers, SOUTHDIV