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NAS CECIL FIELD, FL  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT RECORD OF  
DECISION FOR OPERABLE UNIT 12 (OU 12) SITE 32 DEFENSE REUTILIZATION AND  
MARKETING OFFICE ASPHALT STORAGE YARD NAS CECIL FIELD FL  
10/8/2003  
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

4WD/FFB

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

Subject: Draft Record of Decision (ROD), Operable Unit 12, Site 32, DRMO  
Asphalt Storage Yard, NAS Cecil Field, Jacksonville, FL

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has completed the review of the subject document. Attached is an annotated copy of the draft ROD which includes specific recommended changes. Other comments follow:

1. Section 1.4, Description of the Selected Remedy. The remedy selected in this ROD utilizes LUCs to prohibit residential use and to require proper maintenance of the asphalt pavement by the property owner. First, please supplement the described LUCs to include a prohibition against excavation of the asphalt or any surface with soil contamination in excess of health-based levels without prior written consent by the Navy, EPA and FDEP. This restriction is different than a requirement to "maintain" the asphalt surface, as noted in Section 2.10.2. Second, the ROD states that institutional controls and deed restrictions will be implemented to accomplish the restricted use goals. Please provide a brief summary of the specific institutional controls and/or deed restrictions that will be used. In addition, EPA guidance<sup>1</sup> states that the remedy selection description in the Declaration should include a description of the entities responsible for implementing and enforcing the institutional controls and provides an example: land use zoning restrictions enforced by town planning board. Please provide a description of the entity(ies) responsible.
2. Section 2.6.2, Ecological Risks. This section contains the statement that "Terrestrial receptors consist of species acclimated to urban and industrial conditions." This statement is confusing since the section seems to conclude

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<sup>1</sup>A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, July 30, 1999.

that PAHs (1) present risk only to terrestrial invertebrates, such as earthworms, but that (2) due to the small size of the site, pose minimal ecological risk. The risk posed by the surface water in the aquatic portion of the retention pond is not discussed. Please clarify.

3. Section 2.8.2, Alternative 2: LUCs and Monitoring: See comment 1 about the need for a restrictive covenant to prevent excavation through the asphalt.
4. Section 2.11.2, Protection of Human Health and the Environment: See comment 1 about the need for a restrictive covenant to prevent excavation through the asphalt.
5. Section 2.11.2, Compliance with Applicable or Relevant and Appropriate Requirements. This section states that the selected remedy will not comply with chemical-specific ARARs because COC concentrations would not be actively reduced. There does not appear to be a chemical-specific ARAR for soils listed. The remedy must either comply with ARARs or seek a waiver. Please clarify how the selected remedy complies with this requirement.

EPA appreciates the opportunity to work with the Navy on this project at Cecil Field. If you have any questions regarding these comments please contact me at 404/562-8539 or at [Vaughn-wright.Debbie@epa.gov](mailto:Vaughn-wright.Debbie@epa.gov).

Sincerely,



Deborah a. Vaughn-Wright  
Remedial Project Manager  
Fl-AL-MS Federal Oversight Section

Enclosure

Cc: Jeff Meyers, SOUTHDIV  
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Mark Speranza, TTNUS  
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