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NAS CECIL FIELD, FL
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON DRAFT RECORD OF DECISION FOR OPERABLE UNIT 9 (OU 9) SITE 57 AND SITE 58 NAS CECIL FIELD FL
12/29/2003
U S EPA REGION IV

Jonnet, Mark

From: Speranza, Mark
Sent: Monday, December 29, 2003 2:23 PM
To: Glorieux, Jean-Luc; Jonnet, Mark; Logan, Joe; Dutka, Gary
Cc: Miller, Ralinda; Simcik, Robert
Subject: FW: OU9, Sites 57/58 Draft ROD

-----Original Message-----
From: Vaughn-Wright.Debbie@epamail.epa.gov [mailto:Vaughn-Wright.Debbie@epamail.epa.gov]
Sent: Monday, December 29, 2003 2:14 PM
To: mark.e.davidson@navy.mil; Grabka, David; Speranza, Mark; MeyersJG@efdsouth.navfac.navy.mil; Michael Halil
Cc: Simcik, Robert; Miller, Ralinda
Subject: OU9, Sites 57/58 Draft ROD

All,

EPA submitted comments for this ROD September 4, 2003. I have just received a few comments from EPA HQ's. Headquarters review focused in on the land use control portion of the ROD but the reviewers noticed a few other points as well.

1. Section 1.2, The Statement of Basis and Purpose does not contain any statement regarding the State's position. Older RODs did contain a statement that the State concurs with the selected remedy. In recent RODs this statement was removed per David's request. Per EPA Guidance on how to prepare a ROD, Section 1.2, this section should specify whether the State concurs or does not concur with the selected remedy. This is standard language which goes into all RODs nationwide. David - please double check with your management why they did not like this statement.

2. Section 1.4, Description of the Selected Remedy, 6th Line of new language the Region inserted. We originally suggested "limit prevent extraction" . This obviously is grammatically incorrect. Recommend "The selected remedy for OU 9, Sites 57 and 58 includes monitored natural attenuation for groundwater and land use controls that will restrict extraction and prohibit consumption of groundwater from this location." Question to the entire team - do we want to limit, restrict or prevent groundwater use? If I understand section 2.10.2.3 correctly, one of the LUC objectives is to prohibit all use. If no use is to be allowed, then the wording should be "prohibit" rather than "restrict". When my HQ's reviewer read the same section she came away with idea that some usage was OK.

3. Section 1.4, Description of the Selected Remedy, last paragraph. Between the time I submitted my September comments and when the OU 11, site 45 ROD went final, there was a change to this paragraph. Please make sure the last paragraph reflects what was negotiated for the Site 45 ROD. Knowing TTNUS, this change has probably already been made. "The Navy shall prepare in accordance with U.S.EPA Guidance and submit to the U.S. EPA and Florida Department of Environmental Protection

(FDEP) a Remedial Design as well as all other post-ROD documents as specified in the Federal Facility Agreement (FFA) dated October 23, 1990."

Happy New Year -

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