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NAS CECIL FIELD, FL
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT RECORD OF
DECISION FOR OPERABLE UNIT 10 (OU 10) SITE 21 NAS CECIL FIELD FL
7/12/2004
U S EPA REGION IV

July 12, 2004

EMAIL & US MAIL

4WD-FFB

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

SUBJ: Draft Record of Decision, Operable Unit 10, Site 21
Naval Air Station, Cecil Field, Florida

Dear Mr. Davidson:

The Environmental Protection Agency (EPA) has reviewed the subject document. Comments are enclosed. If you have any questions, please call me at (404) 562-8549.

Sincerely,

Doyle T. Brittain
Senior Remedial Project Manager

Enc.

cc: David Grabka, FDEP
Mark Speranza, TTNUS
Stephen Ball, EPA

D.Brittain/dtb:4WD-FFB:28549:07-12-04:NASCF04-01-OU10, Site 21

D.BRITTAIN
FL/AL/MS
Fed. Oversight
Section

**Environmental Protection Agency Comments on the
Draft Record of Decision, Operable Unit 10, Site 21**

1. Page 1-2, paragraph prior to 1.5 Statutory Determinations, states that the Navy will prepare post-ROD documents in accordance with the FFA. EPA suggests referring to both the FFA and the Principles, such as, “in accordance with the FFA . . . dated . . . 1990, and supplemented by the 2003 Navy Principles.”
2. Page 2-16, 1st bullet, please add “elementary and secondary schools, child care facilities and playgrounds” to the list of prohibited uses.
3. Page 2-16, please add “and remedy integrity” after the word “obligations” 2nd full paragraph (not counting the bullets), second sentence.
4. EPA provided the two following comments on an earlier draft. It is not apparent to EPA that these comments have been addressed. The NCP states (40 CFR 300.430(f)(5)(ii)(F)) that if the preference for treatment is not satisfied (which this remedy does not), the ROD “must explain why a remedial action involving such reductions in toxicity, mobility, or volume was not selected.” Sections 1.5 and 2.11.6 (2.11.7 in the earlier draft) include the following language, “Although the selected remedy does not provide for treatment as a principal element, reduction of soil and groundwater contaminant concentrations are expected over time due to biological, dispersion, advection, and adsorption processes.” Although that statement provides helpful information, it is not an explanation for why a remedy that satisfies the statutory preference was not selected. The ROD guidance (see page 6-4) gives some examples: specific factors used to determine that the treatment is impracticable, and no source materials that are considered principal threats addressed within the scope of this action.
 - a. Section 1.5 should provide a justification for why the statutory preference for treatment was not achieved.
 - b. Section 2.11.7 should provide a justification for why the statutory preference for treatment was not achieved (should be consistent with the statement in Section 1.5).
5. The Five Year Review is a separate requirement of CERCLA, and probably should not be described as part of the Selected Remedy. (Section 1.5)
6. Section 2.10.2 opening sentence states that there are five components to the remedy but the following text lists only four components.
7. The text in Section 2.12 more appropriately falls under the heading Responsiveness Summary. The dates for publishing the Proposed Plan and the public comment period have not been included.