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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 5 (OU 5) SITE 49 FORMER SKEET RANGE NAS CECIL
FIELD FL
6/27/2006
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 27, 2006

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: Operable Unit 5, Site 49, Draft Record of Decision
Naval Air Station, Cecil Field, Florida

Dear Mr. Davidson:

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

Sincerely,

A handwritten signature in black ink that reads "Doyle J. Brittain".

Doyle J. Brittain
Senior Remedial Project Manager

cc: David Grabka, FDEP
Mark Speranza, TTNUS
Mike Halil, CH2MHill

**EPA Comments on the ROD for OU 5, Site 49 Former Skeet Range
Naval Air Station Cecil Field Jacksonville, Florida**

Specific Comments

1. **Table of Contents, Page iii** – Please add a Section 3.0 Responsiveness Summary as required by EPA ROD Guidance¹. This Section could be included as an Appendix instead. Section 2-3 Highlights of Community Participation on Page 2-4 states that the Responsiveness Summary is provided in Appendix A. The document provided to the EPA did not have a Responsiveness Summary.
2. **Section 1.1, Page 1-1**– Please provide the Superfund Site identification number in addition to the EPA ID number.
3. **Section 1.2, First Sentence, Page 1-1** – Replace the term ‘presents’ with ‘documents’.
4. **Section 1.2, Second to last sentence, Page 1-1** – Revise the sentence to read “This decision was based on information contained in the Administrative Record which is located at the former Memorial Chapel, 6112 New World Avenue, Cecil Commerce Center, Jacksonville, Florida 32221.”
5. **Section 1.2, Last Sentence, Page 1-1** – Revise the sentence to read “The United States Department of the Navy (hereinafter the Navy) and U.S. EPA Region 4 select the remedy of No Further Action (NFA).”
6. **Section 1.3, First Paragraph, Page 1-1** – Delete or relocate this information to Section 2.1. Also, consider revising first sentence to reflect that cleanup is being conducted under CERCLA authority pursuant to the FFA.
7. **Section 1.3, Second Paragraph, Page 1-1** – Revise first sentence to read “The Navy and U.S. EPA, with concurrence of FDEP, have determined that No Further Action is required to ensure protection of human health and the environment at OU 5, Site 49.”
8. **Section 1.3, Second Paragraph, Page 1-1** – Other than the first sentence (revised per comment #7 above) delete the remainder of the paragraph. The basis for selecting the remedy was described in the proposed plan and should be summarized in Section 1.2.
9. **Section 1.4, First sentence, Page 1-1** – Delete the entire first sentence since per EPA ROD Guidance the typical statutory determinations are not required. For example, compliance with ARARs is not required for a No Action decision. Reference *ARARs Q’s*

¹ *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*, EPA OSWER 9200.1-23P (July 1998). Pages 8-1 and 8-7 [hereinafter “EPA ROD Guidance”]

& A's: General Policy, RCRA, CWA, SDWA, Post-ROD Information, and Contingent Waivers, EPA OSWER 9234.2-01/FS-A (June 1991).

10. **Section 1.4, Page 1-1** – Please provide a more detailed summary of how the two previous soil removal actions eliminated the need for further remedial action. For example, specify the CoCs in the soil and approximate amount of soil removed, etc, that supports the statement that “no contaminants remain on site at concentrations of concern. Also, add the following sentence: “The measured level of risk to human health and the environment allows for unrestricted use and unlimited exposure.”
11. **Section 1.5, Page 1-1** – Revise the Section Title to “AUTHORIZING SIGNATURES”.
12. **Section 2.2, Second Paragraph, Page 2-2** – Revise second sentence to read: “Pursuant to the FFA, the Navy has conducted remedial investigations and response actions under CERCLA authority.” Revise third sentence to read: “OU 5 is one of twelve (12) OUs that are included the FFA to be addressed under the CERCLA program.” Add a sentence at the end of the paragraph that states that the corrective actions otherwise required by the HSWA permit have been deferred to the CERCLA program in accordance with the FFA Section XXXXX.
13. **Section 2.3, First Paragraph, Last sentence, Page 2-4** – As noted in Comment #1 above, there is not a Responsiveness Summary in Appendix A. Please make sure that one is included either in the text as Section 3.0 or as an Appendix.
14. **Section 2.7, Page 2-9** – Add a Section 2.7.3 Risk Assessment Summary that includes language for Site 49 similar to the following:

2.7.3 **Risk Assessment Summary**

The HHRA determined that all ILCRs resulting from exposure to Site 2 and 15 media are below or within the U.S. EPA's acceptable risk range of 1.0E-06 and 1.0E-04. Additionally, all HIs are less than the acceptable risk threshold of 1.0. Furthermore, the results of COPC screening and food chain modeling indicate that COPCs do not pose significant potential risks to terrestrial and aquatic receptors.

Based on the absence of excess risk to human health and the environment from contaminants in the media investigated, a no action/no further action remedy has been selected as the appropriate response action for Sites 2 and 15.

The measured level of risk to human health or environmental receptors allows for unrestricted use and/or unlimited exposure.

15. **Section 2.8, Page 2-10** – Please add the following sentences to the Section: “The Navy and EPA, with concurrence by FDEP have determined that no remedial action is required to ensure protection of human health and the environment at Site 49. This response action may be re-evaluated in the future if the parties become aware of new information and conditions at Site 49 which indicate that an unacceptable risk to human health or the environment exists.”