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NAS CECIL FIELD
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SITE MANAGEMENT PLAN NAS CECIL FIELD FL
11/20/1991
NAVFAC SOUTHERN

NAVAL AIR STATION CECIL FIELD
JACKSONVILLE, FLORIDA

SITE MANAGEMENT PLAN

20 November 1991

Report Prepared by:

Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Charleston, South Carolina

This approach synthesizes prioritization of sites with a realistic view of dynamic environmental systems. Areas which are more easily defined can be identified and treated, thereby removing potential sources of contamination in a timely manner. Flowing groundwater and surface water systems are naturally continuous, without regard for site boundaries, and may be investigated and treated as a single system or set of systems.

Through this approach, the RI/FS process can be responsive to individual site characteristics and technical requirements, without lengthy delays between field actions. This provides the flexibility to address any site, operable unit, or set of operable units separately or as a whole. In addition, specific matrices (i.e., soil/sediment, groundwater, surface water, or air) of individual sites, or operable units, can be treated separately if necessary, or a single matrix may be investigated at one time across the entire facility.

III. LISTING OF POTENTIAL SOURCES OF CONTAMINATION (PSCs)

Potential sources of contamination (PSCs) at NAS Cecil Field can be separated into two categories, Site Screening PSCs or RI/FS PSCs, depending on the level of investigation that has been performed at the individual PSCs.

Sites where the potential for contamination has been identified, but little or no confirmation data is available, are classified as Site Screening PSCs. These sites will require initial confirmation and characterization sampling prior to determining if further investigation is necessary. The Site Screening PSCs are listed below but they are not yet a part of the RI/FS process and will not be discussed further in this SMP.

SITE SCREENING PSCs

PSC No.	Site Name
4	Grease Pits
6	Lake Fretwell Rubble Disposal Area
9	Recent Grease Pits
12	Public Works Disposal Area
18	Ammunition Disposal Area
19	Rowell Creek Rubble Disposal Area

Operable Unit 2 - Oil/Sludge Disposal Areas

PSC 3 - Oil Sludge Disposal Area
PSC 5 - Oil Disposal Area Northwest
PSC 17 - Oil/Sludge Disposal Pit Southwest

Operable Unit 7 - AIMD Seepage Pit

PSC 16 - AIMD Seepage Pit

This first group of Operable Units was selected for the following reasons:

- historically, landfills and unlined disposal pits have represented a source for significant levels of both groundwater and soil contamination,
- high volume of waste reportedly disposed at these sites,
- geographic proximity of Operable Units 1 and 2, and
- RCRA regulatory requirements (PSC 16).

Investigative Set 2

Operable Unit 3 - Fire Training Areas

PSC 7 - Old Fire Fighting Training Area
PSC 8 - Boresite Range Fire Fighting Training Area

Operable Unit 4 - Rubble Disposal Areas

PSC 10 - Rubble Disposal Area

Operable Unit 5 - Ordnance Disposal Areas

PSC 14 - Blue 5 Ordnance Disposal Area
PSC 15 - Blue 10 Ordnance Disposal Area

Operable Unit 6 - Pesticide Disposal Area

PSC 11 - Golf Course Pesticide Disposal Area

The second group of Operable Units was selected for the following reasons:

- lower volume of waste reportedly disposed at these sites,
- location of sites in restricted areas of the base, and
- lower mobility of suspected contaminants at some sites.

IV. SCHEDULE

General Deliverables (all operable units)	**Transmittal Date**
Site Management Plan	1 September 1993
Quarterly Progress Reports	30 October 1991
	30 January 1992
	30 April 1992
	30 July 1992

Investigative Set 1

1992 Primary Deliverables	**Transmittal Date**
Draft RI/FS Report	7 July 1992

1993 Projected Primary Deliverables	
Draft Final RI/FS Report	16 February 1993
Final RI/FS Report	25 March 1993
Draft Proposed RA Plan	23 February 1993
Draft Final Proposed RA Plan	28 September 1993
Final RA Plan	4 November 1993
Draft ROD	28 September 1993

1992 Secondary Deliverables	**Transmittal Date**
Draft Baseline Risk Assessment	7 July 1992

Investigative Set 2

1992 Primary Deliverables	**Transmittal Date**
Draft Work Plan	16 February 1992

1993 Projected Primary Deliverables	**Transmittal Date**
Draft RI/FS Report	3 June 1993

1992 Secondary Deliverables	**Transmittal Date**
Draft Sampling & Analysis Plan	16 February 1992
Draft Final Sampling & Analysis Plan	29 July 1992
Final Sampling & Analysis Plan	4 September 1992

Schedule Name : NAS Cecil Field - Site Management Plan
Responsible : Cliff Casey
As-of Date : 20 November 1991 Schedule File : SMP1F
Operable Units: 1, 2, and 7
Schedule Type : Federal Facilities Agreement

Task Name	Start Date	End Date	Duratn (Days)
POA, Negotiation, Award	17-Jul-91	15-Oct-91	90.0
RI/FS	15-Oct-91	25-Mar-93	527.0
RI Field Work	15-Oct-91	21-Jan-92	98.0
Site Recon	15-Oct-91	22-Oct-91	7.0
Site Clearing	22-Oct-91	5-Nov-91	14.0
Soil Gas Sampling	22-Oct-91	5-Nov-91	14.0
In-situ GW Sampling	22-Oct-91	5-Nov-91	14.0
EM Survey	5-Nov-91	19-Nov-91	14.0
Surface Soil Sampling	19-Nov-91	26-Nov-91	7.0
Shallow Soil Borings	5-Nov-91	26-Nov-91	21.0
Monitoring Well Inst.	26-Nov-91	14-Jan-92	49.0
GW Sampling/Levels	31-Dec-91	21-Jan-92	21.0
Aquifer testing	31-Dec-91	21-Jan-92	21.0
SW/Sed. Sampling	26-Nov-91	3-Dec-91	7.0
SW Flow Measurement	26-Nov-91	3-Dec-91	7.0
Location Survey	7-Jan-92	21-Jan-92	14.0
Data Assessment	5-Nov-91	24-Mar-92	140.0
Lab Analysis	5-Nov-91	25-Feb-92	112.0
Data Validation	26-Nov-91	3-Mar-92	98.0
Data Evaluation	10-Dec-91	17-Mar-92	98.0
Baseline Risk Assessment	24-Dec-91	24-Mar-92	91.0
Feasibility Study	10-Dec-91	25-Mar-93	471.0
Identify ARARs	10-Dec-91	7-Jan-92	28.0
Develop Alternatives	10-Dec-91	21-Jan-92	42.0
Screen Alternatives	24-Dec-91	3-Mar-92	70.0
Analyze Alternatives	3-Mar-92	26-May-92	84.0
RA of Alternatives	3-Mar-92	26-May-92	84.0
Treatability Studies	24-Dec-91	17-Mar-92	84.0
Draft RI/FS Report	24-Mar-92	25-Dec-92	276.0
Prepare Draft RI/FS Rpt.	24-Mar-92	7-Jul-92	105.0
Navy Review	23-Jun-92	7-Jul-92	14.0
Submit to EPA/FDER	7-Jul-92	14-Jul-92	7.0
EPA/FDER Review	14-Jul-92	12-Oct-92	90.0
EPA/FDER Mail Comments	12-Oct-92	19-Oct-92	7.0
Respond to Comments	19-Oct-92	18-Dec-92	60.0
Mail Responses	18-Dec-92	25-Dec-92	7.0
Draft Final RI/FS Report	18-Dec-92	25-Mar-93	97.0
Prepare Draft Final	18-Dec-92	16-Feb-93	60.0
Submit to EPA/FDER	16-Feb-93	23-Feb-93	7.0
EPA/FDER Review	23-Feb-93	25-Mar-93	30.0
Final RI/FS Report	25-Mar-93	25-Mar-93	0.0
Proposed Plan	17-Jan-93	1-Feb-94	380.0
Draft	17-Jan-93	6-Aug-93	201.0
Prepare Draft Plan	17-Jan-93	16-Feb-93	30.0
Submit to EPA/FDER	16-Feb-93	23-Feb-93	7.0

Schedule Name : NAS Cecil Field - Site Management Plan
Responsible : Cliff Casey
As-of Date : 20 November 1991 Schedule File : SMP1F
Operable Units: 1, 2, and 7
Schedule Type : Federal Facilities Agreement

Task Name	Start Date	End Date	Duratn (Days)
EPA/FDER Review	23-Feb-93	24-May-93	90.0
EPA/FDER Mail Comments	24-May-93	31-May-93	7.0
Respond to Comments	31-May-93	30-Jul-93	60.0
Mail Responses	30-Jul-93	6-Aug-93	7.0
Final	30-Jul-93	1-Feb-94	186.0
Prepare Draft Final Plan	30-Jul-93	28-Sep-93	60.0
Submit Draft Final	28-Sep-93	5-Oct-93	7.0
EPA/FDER Review	5-Oct-93	4-Nov-93	30.0
Final Plan	4-Nov-93	4-Nov-93	0.0
Prepare/Publish Public Not	4-Nov-93	18-Nov-93	14.0
Public Comment Period	18-Nov-93	2-Jan-94	45.0
Public Meeting	2-Dec-93	3-Dec-93	1.0
Responsiveness Summary	2-Jan-94	1-Feb-94	30.0
Record of Decision	29-Aug-93	16-Jun-94	291.0
Draft	29-Aug-93	18-Mar-94	201.0
Prepare Draft ROD	29-Aug-93	28-Sep-93	30.0
Submit to EPA/FDER	28-Sep-93	5-Oct-93	7.0
EPA/FDER Review	5-Oct-93	3-Jan-94	90.0
EPA/FDER Mail Comments	3-Jan-94	10-Jan-94	7.0
Respond to Comments	10-Jan-94	11-Mar-94	60.0
Mail Responses	11-Mar-94	18-Mar-94	7.0
Final	11-Mar-94	16-Jun-94	97.0
Prepare Draft Final ROD	11-Mar-94	10-May-94	60.0
Submit Draft Final	10-May-94	17-May-94	7.0
EPA/FDER Review	17-May-94	16-Jun-94	30.0
Final ROD	16-Jun-94	16-Jun-94	0.0

Schedule Name : NAS Cecil Field - Site Management Plan
Responsible : Cliff Casey
As-of Date : 20 November 1991 Schedule File : SMP2F
Operable Units: 3, 4, 5 and 6
Schedule Type : Federal Facilities Agreement

Task Name	Start Date	End Date	Duratn (Days)
Work Plan Preparation	1-Jan-92	4-Sep-92	247.0
Notice to Proceed	1-Jan-92	2-Jan-92	1.0
Revisions	2-Jan-92	16-Feb-92	45.0
Submit Draft	16-Feb-92	23-Feb-92	7.0
Agency Review	23-Feb-92	24-Mar-92	30.0
Mail Comments	24-Mar-92	31-Mar-92	7.0
Address Comments	31-Mar-92	30-May-92	60.0
Mail Responses	30-May-92	6-Jun-92	7.0
Prepare Draft Final	30-May-92	29-Jul-92	60.0
Submit Draft Final	29-Jul-92	5-Aug-92	7.0
Final Work Plan	5-Aug-92	4-Sep-92	30.0
POA, Negotiation, Award	27-Jun-92	10-Sep-92	75.0
RI/FS	10-Sep-92	19-Feb-94	527.0
RI Field Work	10-Sep-92	17-Dec-92	98.0
Site Recon	10-Sep-92	17-Sep-92	7.0
Site Clearing	17-Sep-92	1-Oct-92	14.0
Soil Gas Sampling	17-Sep-92	1-Oct-92	14.0
In-situ GW Sampling	17-Sep-92	1-Oct-92	14.0
EM Survey	1-Oct-92	15-Oct-92	14.0
Surface Soil Sampling	15-Oct-92	22-Oct-92	7.0
Shallow Soil Borings	1-Oct-92	22-Oct-92	21.0
Monitoring Well Inst.	22-Oct-92	10-Dec-92	49.0
GW Sampling/Levels	26-Nov-92	17-Dec-92	21.0
Aquifer testing	26-Nov-92	17-Dec-92	21.0
SW/Sed. Sampling	22-Oct-92	29-Oct-92	7.0
SW Flow Measurement	22-Oct-92	29-Oct-92	7.0
Location Survey	3-Dec-92	17-Dec-92	14.0
Data Assessment	1-Oct-92	18-Feb-93	140.0
Lab Analysis	1-Oct-92	21-Jan-93	112.0
Data Validation	22-Oct-92	28-Jan-93	98.0
Data Evaluation	5-Nov-92	11-Feb-93	98.0
Baseline Risk Assessment	19-Nov-92	18-Feb-93	91.0
Feasibility Study	5-Nov-92	19-Feb-94	471.0
Identify ARARs	5-Nov-92	3-Dec-92	28.0
Develop Alternatives	5-Nov-92	17-Dec-92	42.0
Screen Alternatives	19-Nov-92	28-Jan-93	70.0
Analyze Alternatives	28-Jan-93	22-Apr-93	84.0
RA of Alternatives	28-Jan-93	22-Apr-93	84.0
Treatability Studies	19-Nov-92	11-Feb-93	84.0
Draft RI/FS Report	18-Feb-93	21-Nov-93	276.0
Prepare Draft RI/FS Rpt.	18-Feb-93	3-Jun-93	105.0
Navy Review	20-May-93	3-Jun-93	14.0
Submit to EPA/FDER	3-Jun-93	10-Jun-93	7.0
EPA/FDER Review	10-Jun-93	8-Sep-93	90.0
EPA/FDER Mail Comments	8-Sep-93	15-Sep-93	7.0

Schedule Name : NAS Cecil Field - Site Management Plan
Responsible : Cliff Casey
As-of Date : 20 November 1991 Schedule File : EXSMP1
Operable Units: 1, 2, and 7
Schedule Type : Expedited

Task Name	Start Date	End Date	Duratn (Days)
Prepare Public Notice	30-Dec-92	14-Jan-93	15.0
Public Comment Period	14-Jan-93	28-Feb-93	45.0
Public Meeting	28-Jan-93	29-Jan-93	1.0
Responsiveness Summary	28-Feb-93	30-Mar-93	30.0
Record of Decision	14-Nov-92	14-May-93	181.0
Draft	14-Nov-92	27-Feb-93	105.0
Prepare Draft ROD	14-Nov-92	29-Dec-92	45.0
EPA/FDER Review	29-Dec-92	28-Jan-93	30.0
Respond to Comments	28-Jan-93	27-Feb-93	30.0
Final	30-Mar-93	14-May-93	45.0
Prepare Draft Final ROD	30-Mar-93	29-Apr-93	30.0
EPA/FDER Review	29-Apr-93	14-May-93	15.0
Final ROD	14-May-93	14-May-93	0.0

Schedule Name : NAS Cecil Field - Site Management Plan
Responsible : Cliff Casey
As-of Date : 20 November 1991 Schedule File : EXSMP2B
Operable Units: 3, 4, 5 and 6
Schedule Type : Expedited

Task Name	Start Date	End Date	Duratn (Days)
Work Plan Preparation	2-Jan-92	1-Jul-92	181.0
Notice to Proceed	2-Jan-92	3-Jan-92	1.0
Revisions	3-Jan-92	17-Feb-92	45.0
Agency Review	17-Feb-92	18-Mar-92	30.0
Address Comments	18-Mar-92	2-May-92	45.0
Prepare Draft Final	2-May-92	16-Jun-92	45.0
Final Work Plan	16-Jun-92	1-Jul-92	15.0
POA, Negotiation, Award	19-Jun-92	8-Aug-92	50.0
RI/FS	8-Aug-92	28-Sep-93	416.0
RI Field Work	8-Aug-92	14-Nov-92	98.0
Site Recon	8-Aug-92	15-Aug-92	7.0
Site Clearing	15-Aug-92	29-Aug-92	14.0
Soil Gas Sampling	15-Aug-92	29-Aug-92	14.0
In-situ GW Sampling	15-Aug-92	29-Aug-92	14.0
EM Survey	29-Aug-92	12-Sep-92	14.0
Surface Soil Sampling	12-Sep-92	19-Sep-92	7.0
Shallow Soil Borings	29-Aug-92	19-Sep-92	21.0
Monitoring Well Inst.	19-Sep-92	7-Nov-92	49.0
GW Sampling/Levels	24-Oct-92	14-Nov-92	21.0
Aquifer testing	24-Oct-92	14-Nov-92	21.0
SW/Sed. Sampling	19-Sep-92	26-Sep-92	7.0
SW Flow Measurement	19-Sep-92	26-Sep-92	7.0
Location Survey	31-Oct-92	14-Nov-92	14.0
Data Assessment	29-Aug-92	16-Jan-93	140.0
Lab Analysis	29-Aug-92	12-Dec-92	105.0
Data Validation	19-Sep-92	19-Dec-92	91.0
Data Evaluation	3-Oct-92	2-Jan-93	91.0
Baseline Risk Assessment	17-Oct-92	16-Jan-93	91.0
Feasibility Study	3-Oct-92	28-Sep-93	360.0
Identify ARARs	3-Oct-92	31-Oct-92	28.0
Develop Alternatives	3-Oct-92	14-Nov-92	42.0
Screen Alternatives	17-Oct-92	26-Dec-92	70.0
Analyze Alternatives	26-Dec-92	20-Mar-93	84.0
RA of Alternatives	26-Dec-92	20-Mar-93	84.0
Treatability Studies	17-Oct-92	9-Jan-93	84.0
Draft RI/FS Report	16-Jan-93	30-Jul-93	195.0
Prepare Draft RI/FS Rpt.	16-Jan-93	1-May-93	105.0
EPA/FDER Review	1-May-93	15-Jun-93	45.0
Respond to Comments	15-Jun-93	30-Jul-93	45.0
Draft Final RI/FS Report	30-Jul-93	28-Sep-93	60.0
Prepare Draft Final	30-Jul-93	13-Sep-93	45.0
EPA/FDER Review	13-Sep-93	28-Sep-93	15.0
Final RI/FS Report	28-Sep-93	28-Sep-93	0.0
Proposed Plan	14-Aug-93	1-Feb-94	171.0
Draft	14-Aug-93	19-Oct-93	66.0

ABB ENVIRONMENTAL SERVICES INC.
INTERNAL CORRESPONDENCE

TO: File
FROM: Barry Lester BL

DATE: December 23, 1992

SUBJECT: **RESPONSE TO COMMENTS ON 1993 SMP SUBMISSION DATED 20 OCTOBER 1992 NAS CECIL FIELD, CTO # 035 CONTRACT N62467-89-D-0317**

Attached is a copy of responses prepared for Cliff Casey on the 1993 SMP submitted to EPA and FDER on 20 October 1992. These comments were discussed on 22 December 1992 and electronic files transferred by Modem to Cliff the same date.

FILE COPY
Job # CTO-035
File # 9.3.2
Date: 12/23/92

RESPONSE TO USEPA'S COMMENTS AND QUESTIONS
DATED 17 DECEMBER 1992
FOR SITE MANAGEMENT PLAN
DATED 20 OCTOBER 1992
NAS CECIL FIELD

1. **COMMENT**: In the meeting dated September 18, 1992, the Navy indicated the schedules in their present form are realistic and little or no change could be made to expedite remedial actions. However, the Navy made more changes to an already unreasonable schedules without providing any justification. The second submittal of the SMP reflects further extensions and delays in moving toward Records of Decision (ROD's) than the draft SMP dated August 31, 1992 (e.g. OU 5 Final ROD moved from August 27, 2004 to February 4, 2008). This again demonstrates the Navy's unwillingness to cooperate with EPA in negotiating reasonable schedules.

   RESPONSE: *The presentation of the schedule has unfortunately lead to some misunderstanding. The USEPA reviewer misread the ROD dates listed in the August SMP; for example August 27, 2004, was quoted as the ROD completion date for OU 5, whereas the actual OU 5 proposed ROD completion date in the August SMP is August 13, 2007. The October SMP listed the OU 5 ROD completion date as February 4, 2008. The difference between the schedules presented in August and October is due to SMP approval delays, duration of field investigations, and EPA's request for longer review periods before the RI and FS documents become final.*

2. **COMMENT**: The excessive delays between finalization of the Proposed Plan and the submittal of the draft ROD is unacceptable. The draft ROD should begin development no later than the date the Navy's submittal of the draft final Proposed Plan.

   RESPONSE: *It is the Navy's understanding that the National Contingency Plan requires a public comment period. If this is not a legislative requirement, then the Navy is willing to negotiate this point. However, the Navy insists on allowing public access to the remedial process.*

3. **COMMENT**: Many time-frames in the ROD process are excessively long. For example, time-frames for Navy response to public comments should be reduced from forty-five (45) days to fifteen (15) days at a maximum. Such time cuts move ROD dates to an earlier date overall. The enclosure recommends time-frames that could be utilized to reach ROD's earlier.

   RESPONSE:

   a. Section XXX of the Federal Facility Agreement requires a public comment period of 45 days.

   b. Rather than discussing the merits of each item, the Navy proposes a meeting between FFA parties to define a generic schedule. The generic schedule would designate acceptable time periods and identify actions that can be performed concurrently. Once a generic schedule is agreed to, then site-specific schedules could be established.

4. **COMMENT**: EPA recommends that the Navy implement simultaneous investigations at different operable units, as the Navy agreed to perform in the SMP FY92.

RESPONSE: *The Navy has limited internal resources, which are not designed to manage multiple projects with the associated tremendous administrative burden. The attached letter to Ms. Allison Drew dated January 15, 1992, discusses these issues in detail.*

5. **COMMENT**: The Human Health and Ecological Risk Assessment should be conducted concurrently. There is no reason to conduct these investigations consecutively as currently scheduled at Operable Unit (OU) 1.

RESPONSE: *Ecological Risk Assessment and Human Risk Assessment are not dependent on each other, except that both must be completed before the Risk Assessment Report. Human Risk Assessment is dependent on data validation and Ecological Risk Assessment is dependent on seasons. Ecological Risk Assessment is not part of the critical path and can be performed concurrently with Human Risk Assessment; however, this will not change the ROD completion date.*

6. **COMMENT**: The Navy should explain the thirty (30) day down time in "POA Proposed and Subcontracting" that is allotted before each round of field work at all operable units.

RESPONSE: *Thirty days between each investigation is reserved for development of plans of action and subcontracting. The plan of action ensures that information gained during the first investigative activity is incorporated into the next investigation. Once all parties have agreed to the proposed activities, then the appropriate subcontractors are notified of the start work date.*

SPECIFIC COMMENTS

EARLY ASSESSMENT AND REMOVAL INITIATIVE
NAS CECIL FIELD

1. **COMMENT**: The process as described by the Navy in this document is a remedial action and not a removal. EPA strongly recommends that the Navy immediately submit a Removal Action Plan to this office for approval of removal for buried drums at the Golf Course Pesticide Disposal Area. The Navy has obtained sufficient data on the location and content of the drums and should therefore proceed to clean up the site.

   The Interim ROD may proceed simultaneous to the removal process, which will address any further remediation of the site.

   RESPONSE:

   a. The Navy has proposed a Removal Action for Site 11, because of the reduced number of regulatory requirements for a Removal Action. Because EPA Region IV prefers Interim Record of Decisions (IRODs), the Navy has also proposed a schedule that includes both a Removal Action/Action Memorandum and a Focused Feasibility Study(FFS)/IROD. This redundancy of effort allows the Navy to expedite site removal but still provide EPA Region IV with an IROD. Because of the regulatory requirements involved in either Removal Action or FFS, the Navy would appreciate any guidance or direction that EPA can provide.

   b. The SMP must be approved before the Navy will begin writing the Removal Action Plan. The Navy will solicit EPA comments on the Removal Action Plan before it is implemented.

2. **COMMENT**: Page 2, paragraph 4. EPA questions the reason to perform another magnetometer and EM-31 survey. These surveys were previously performed at the site, where (a) anomalies were identified by the magnetometer survey and (b) soil boring and monitoring well locations were free of utility and buried metal, as confirmed by the EM-31 survey. What additional information can your contractor obtain?

   RESPONSE: *The SMP is a program document designed to establish enforceable milestones. The justification for a specific task duration is defined in the FFA or the site-specific workplans. It is not the intent of this document to discuss the merits of an activity but rather to define the duration of the activity.*

   The original survey identified several anomalies. The original contractor did not identify the survey's beginning point, therefore, these anomalies cannot be relocated. The proposed geophysical survey will delineate site boundary. This information will provide some estimates of the volume of material that must be removed.

3. **COMMENT**: Page 2, paragraph 3. EPA recommends that the Navy seek an Interim ROD to address the residual contamination at the Golf Course Pesticide Disposal Area, following any removal action.

RESPONSE: *The Navy has already included the IROD in the schedule.*

RESPONSE TO FDER COMMENTS AND QUESTIONS
FOR SITE MANAGEMENT PLAN
DATED OCTOBER 20, 1992
NAS CECIL FIELD

1. **Comment:** Site Management Plan is a stand alone document and should:

   a. have all of its pages numbered;

   b. include a map or maps showing the location of all Site Screening PSCs and Remedial Investigation/Feasibility Study PSCs; and

   c. include a brief description of all site screening PSCs and Remedial Investigation/Feasibility Study PSCs.

   Response:

   A. Agree

   B. The SMP is a program document designed to establish enforceable milestones. The justification for a specific task duration is defined in the FFA or the site-specific workplans. It is not the intent of this document to discuss the merits of an activity, but rather to define the duration of the activity.

   C. Same as B.

2. **Comment:** GANTT line charts have recently been prepared in conjunction with NAS Jacksonville's Site Management Plan; their use at NAS Cecil Field would be greatly appreciated.

   Response: *Gantt line chart(s) were presented in SMPs for Cecil Field in the past, but were discontinued at the request of the reviewing agencies. Gantt charts can be included in future reports if required.*

3. **Comment:** The Normal Review Schedule for Operable Units 1, 2, and 7 does not appear to follow an orderly outline form.

   Response: *It is not clear from the question what the reviewer is requesting.*

4. **Comment:** Are any Immediate Remedial Actions planned at Site Screening PSCs or Remedial Investigation/Feasibility Study Sites that present a threat to the general population and/or fauna and flora?

   Response: *There are no "time critical actions" identified at NAS Cecil Field. However, the Navy has identified several sites as potential sites for expedited remedial action. For example, a source removal at Site 11 is currently being proposed.*

5. **Comment:** FDER will try to expedite review times of documents throughout the duration of the Federal Facilities Agreement.

   Response: *Agree.*

6. **Specific Comment:** Under the Site Management Strategy, paragraph 9, does this mean that specific matrices (i.e. groundwater, soil/sediment) could eventually become separate Operable Units?

   Response: *Yes, if the Navy Progam would be more effective with further Operable Unit seperation. However, the Navy would agree to separating a site into more than one operable unit only if the separation was scientifically justified or the process would expedite remedial action at a particular site.*

Operable Unit 1

7. What is a POA? Please explain.

   Response: *The Plan Of Action (POA) defines the contractual actions to be taken by the Navy's Contractor.*

8. What is being subcontracted?

   Response: *The Navy has a primary contractor responsible for overseeing the investigation. Subcontractors are any specialized consultants, such as drillers, analytical laboratories, or soil gas specialist, whose specialized services are needed during the investigation.*

9. Why does lab analysis begin at the conclusion of field work and not run concurrently?

   Response: *In an effort to save time and money, field screening will be performed before beginnning conformational sampling. Once the plume has been characterized, permanent monitoring wells will be installed and sampled. The final sampling and analysis will conform to EPA level 4 data quality objectives for risk assessment data. From the time the sample is collected, the sample analysis will require 30 days. This can be performed concurrently with field activites. Also see responses fo comments 10 and 15.*

10. Why can data validation and lab analysis not be run concurrently?

    Response: *The data validation will be performed concurrently but offset beyond the laboratory analysis by 30 days (the offset is the duration shown in the schedules). This offset is the time required to perform the analysis and compile the supporting documentation that will be needed during data validation. The confusion is the result of logic used by Timeline™, the computer software program used for scheduling.*

11. Ecological Field sampling is scheduled for the winter months under the Risk Assessment. NAS Jacksonville must redo their ecological field sampling that was conducted during the winter and proved inconclusive.

Based upon this previous experience, an alternative period should be considered.

Response: *The ecological sampling will be performed in early spring.*

12. The Draft RI/FS Report is scheduled to begin two months after data validation. Could it begin earlier?

Response: *The bulk of the RI/FS report cannot be written until the analytical data have been validated and the risk assessment has determined the "chemicals of concern."*

Operable Unit 2

13. Can field work activities start simultaneously with OU-1?

Response: *The Navy does not recommend performing multiple investigations for the following reasons.*

1. The Navy's resources are limited and would be unable to accomodate running concurrent teams.

2. Running multiple investigations means that the laboratory would be performing the analyses at the same time, reports would be written concurrently, and agency reviews of documents would be performed at the same time. This is much less effective than performing the investigations sequentially, where the use of the resources are maximized over a longer timeframe, rather than having "lulls" followed by "gluts."

14. There is a month gap between the end of field work OU-1 and the start of field work at OU-2. Why?

Response: *Thirty days between each investigation is reserved for development of plans of action and subcontracting. The plan of action ensures that information gained during the first investigative activity will be incorporated into the next investigation. Once all parties have agreed to the proposed activities, then the appropriate subcontractors are notified of the start date.*

15. Why does analysis and data management begin after the field work is completed and not run concurrently?

Response: *Laboratory analysis and data management will be performed concurrently, but offset from the field work by 30 or 60 days, respectively. The offset is shown in the schedules as the duration. This offset is the time required after the beginning of drilling before the first sampling is collected. The laboratory will require 30 additional days to complete the analysis. The data validators will require 30 additional days to perform their work, and 30 additional days will be required to manage the data. The confusion is the result of the logic used by Timeline™ software.*