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NAS CECIL FIELD
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LETTER AND U S NAVY RESPONSE TO U S EPA REGION IV COMMENTS TO PROPOSED REVISION/RESCOPING PLAN 10 JUNE 1992 NAS CECIL FIELD FL
9/9/1992
NAVFAC SOUTHERN

Barry

DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
2155 EAGLE DR., P. O. BOX 10068
CHARLESTON, S. C. 29411-0068

PLEASE ADDRESS REPLY TO THE COMMANDING OFFICER, NOT TO THE SIGNER OF THIS LETTER. REFER TO:
5090
Code 1852

9 SEP 1992

FILE COPY
Job # CTO-35
File # 9.3.2
Date :

Ms. Alison Drew
U.S. Environmental Protection Agency
Region IV
Waste Management Division
345 Courtland Street, NE
Atlanta, GA 30365

Dear Ms. Drew:

Enclosed are responses to your comments regarding the NAS Cecil Field's Proposed Revision/Rescoping Plan of 10 June 1992. Consistent with past response to comments, SOUTHDIV provides response to comments after all FFA parties have provided their written comments. The Florida Department of Environmental Regulation written comments were received on 4 September 1992.

The Navy does not agree with your proposed due date of 1 December 1992 for the RIFS of Operable Units 1, 2, and 7. This date is unrealistic. SOUTHDIV has notified the USEPA of the need for revised schedules with supporting rationale through multiple letters, meetings, and telephone conversations since January of this year. It is important to note that the USEPA has directed a change in the scope of this work from the approved work plans. The data needed to adequately complete the RIFS for OU's 1, 2, and 7 is not available. The USEPA's request to write a RIFS Report that is not scientifically defensible is a waste of taxpayers money.

The Remedial Project Managers meeting scheduled for 17 September in Atlanta will be an opportunity for the FFA parties to address these issues. Please provide your written rationale and details whereby the work can be completed by 1 December 1992. You may contact Mr. Cliff Casey at (803) 743-0561 if you have questions concerning this matter.

Sincerely,

H. Fraser.

H. FRASER, P.E.
Head, Petroleum Branch

Encl:
(1) Response Comments

Copy to:
Mr. Eric Nuzie, Florida Department of Environmental Regulation
Commanding Officer, Naval Air Station, Cecil Field (Code 18IR)

RESPONSE TO U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS
Technical Review and Comment
Proposed Revision/Rescoping of Approval FY92 SMP
NAS Cecil Field, Jacksonville, Florida

COMMENT 1:
According to the approved FY92 SMP, the following activities were scheduled for completion in FY92:

(i) preparation of the Draft RI/FS report for Operable Units 1, 2 and 7;
(ii) preparation of the Draft, Draft Final, and Final RI/FS Workplans for Operable Units 3, 4, 5, and 6; and
(iii) completion of the RI/FS field work for Operable Units 3, 4, 5 and 6.

Significant funding must have been programmed for FY92 in order to schedule completion of these tasks. The Navy's statement that funds are not available to perform a second round of field work for even a single Operable Unit in FY92 therefore seems unreasonable. As discussed at the May 21, 1992 Project Manager's Meeting, the SMP schedules should be flexible enough to permit use of whatever resources are available. Progress should continue on as many tasks as the existing funds will permit, rather than postponing all work until funding sufficient to permit simultaneous initiation of a large number of tasks becomes available.

RESPONSE:
Funds were programmed for execution of Tasks relating to a Remedial Investigation based on identifying source contamination only. Historical data suggested that the sites were less complex than found to be during the investigation. The cost of field efforts at OU 1,2 and 7 exceeded the planned budget. Funding for other efforts was shifted to cover these costs. Development of the work plan addendum for OU 1,2 and 7 was accomplished in lieu of the OU 1,2 and 7 RI reports.

Field work for OU 3,4,5 and 6 was originally scheduled to begin late in the 4th Quarter FY 92 and be completed in FY 93 based on the premise of source characterization only. Funds to complete work at OUs 1,2 and 7 and to begin work at 3,4,5 and 6 which includes groundwater evaluation is not available in FY92. The Navy is currently reviewing schedules and funding which will identify activities for the FY93 Site Management plan.

RI/FS REVIEW AND PROPOSED CHANGES

COMMENT 1:
Section 1.0, paragraph 1:
According to this section, "significant new site characterization information" was identified at the May 21, 1992 RPM meeting. The cover letter also indicates that "much of the information provided in the workplan addendum was based on predicted results." While EPA appreciates the Navy's efforts to accelerate the investigative process, this approach to document preparation is not acceptable. In the future, the schedules must allot adequate time for completing the data

evaluation process prior to preparing any documents which either report the field sampling results or propose additional investigative work.

RESPONSE:
Agree. The Navy will increase the time allotted for data evaluation on the schedules.

COMMENT 2:
Section 2.0, paragraph 3:
According to this paragraph, "complete analytical results...were not available at [the time of preparation of the workplan addendum]." It was EPA's understanding that all of the data had been received and validated at the time of the March 17, 1992 RPM meeting in Atlanta.

RESPONSE:
The laboratory analytical results presented at the 17 March 1992 meeting had been validated the week before, however, the data had not been evaluated in detail.

COMMENT 3:
Section 3.1, paragraph 2:
Based on the list of tasks completed during the Round 1 investigation of Operable Unit 1 (groundwater sampling, creek sampling, water level measurements), it is unclear whether source characterization activities have been executed or completed for PSCs 1 and 2. This issue must be addressed in the supplemental workplan.

RESPONSE:
The field work identified in the EPA and FDER approved workplan did not include invasive techniques at the landfills (PSC 1 and PSC 2). This strategy was employed to prevent any contained leachate from migrating into groundwater beneath the landfills. Geophysical techniques will be employed during the next round of field work and will be described in the Technical Memorandum for supplemental field activities to be submitted to EPA and FDER. Completion of the monitoring well network also will be conducted in an effort to monitor any off-site migration of contaminants from PSC 1 and PSC 2.

COMMENT 4:
Section 3.1, paragraph 5:
If possible, EPA would like to see a copy of the proposed lower analytical detection limits which will be used to support evaluation of the threat posed to biota prior to submittal of the entire workplan addendum.

RESPONSE:
Agree. Lower analytical detection limits will be provided and discussed with EPA and FDER prior to finalizing the Technical Memorandum for supplemental field activities at OU 1,2 and 7.

COMMENT 5:
Section 3.1, paragraph 8:
Background parameters must be established for all parameters, not just the inorganics.

RESPONSE:
The Navy agrees to provide background data for the TCL and TAL list of parameters. TAL elements are present in nature, although some exist below analytical detection limits. The Navy proposes to conduct background sampling at areas suspected to be free of anthrapogenic activity to determine a natural range for sample parameters at NAS Cecil field. Background concentrations and/or the presence/absence of these parameters will be characterized.

COMMENT 6:
Section 3.3, paragraph 5:
Regarding the scope of Round 1 field work for Operable Unit 7, it is unclear why soil samples were only collected from the 0-2' interval when the suspected source (i.e., the seepage pit) was constructed below the water table.

RESPONSE:
Samples were collected from 0-2' and at the water table. Samples at 0-2' were collected to evaluate the risk of contact to soil. Samples collected at the water table showed elevated levels of contaminates. In the next round of field work soil samples from the vertical zone of the subsurface leaching gallery will be collected as well as groundwater. Physical (i.e. total organic carbon cation exchange capacity, porosity/partial size) and chemical data collected in this episode will be used to estimate the partitioning between aquifer solids and groundwater. This data will be used to evaluate methods of in situ remediation of the aquifer.

COMMENT 7:
Section 4.0, paragraph 5:
EPA agrees that it is not necessary for the Technical Memorandum to go through the formal primary document review process as presented in the Federal Facilities Agreement (FFA). However, these documents must be reviewed for technical adequacy before they can be approved. Due to the time constraints of the various technical review groups within the agency, who provide support for the entire region, a 30-day review period of the draft submittal will be necessary. EPA therefore proposes the following expedited review schedule for all Technical Memoranda:

1. FFA parties review and comment on the draft document: 30 days

2. Navy reviews comments, develops a meeting agenda for discussion of "problem" comments and issues, and provides a copy of this agenda to all FFA parties: 7 days

3. RPM Meeting or Conference Call to resolve outstanding issues: within 7 days

4. Finalization of Technical Memo, possibly while field work underway: 14 days

RESPONSE:
The Navy proposes the following for these non FFA documents:

1. EPA/FDER review of Technical Memorandum and comments provided to Navy within 30 days.

2. Navy incorporates appropriate comments and proceeds with field work.

3. Navy provides response letter to those comments not agreed to.

4. Navy begins field work 50 days after release of Technical Memorandum to EPA and FDER.

COMMENT 8:
Section 4.0, paragraph 9:
EPA agrees in part with the Navy's decision to perform a separate investigation of Rowell Creek. However, since similar sampling strategies and techniques will be employed to investigate all surface water bodies, it will be more time and cost-effective to investigate all surface water bodies which may be impacted by numerous individual sites as part of a single study. Specifically, Lake Fretwell and Sal Taylor Creek should also be included in this investigation. Caldwell Branch and Yellow Water Creek may be investigated as part of the RI/FS for Operable Unit 5 (PSCs 14 & 15), since PSC 15 is the only site with potential to impact these surface water bodies. To quote the approved FY92 SMP, "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...".

In order to ensure that the investigation performed on those surface water bodies will be adequate for its purpose, "surface water bodies" must be established as a separate RI/FS site, or Operable Unit, in the revised SMP. Specifically, since the sampling data obtained from the creeks and lake will be needed to complete the Ecological Risk Assessment for many of the sites in Ous 1-7, EPA must have the means for assuring that the data collected will be of adequate quality for use in achieving this latter goal. Under the terms of the FFA, only the workplans and associated documents for RI/FS sites are subject to the formal review and dispute resolution process. Screening sites are not subject to this same process. "Surface water bodies" must therefore be established as an RI/FS site.

RESPONSE:
The Navy will continue the investigation of the Rowell Creek watershed (including Lake Fretwell) with the goal of determining if the hazardous waste sites have contributed to contamination of sediment and/or surface water and if such contamination poses a risk to the aquatic environment. Unless there is evidence that the hazardous waste sites in the Rowell Creek Watershed contribute to sediment and/or surface water contamination or impact aquatic life either separately or cumulatively, the Navy will not designate Rowell Creek as a separate RI/FS site.

EPA will have the opportunity to review workplans and associated documents pertaining to the Rowell Creek study as these will be submitted as part of the RI/FS activities for the Operable Units currently established. Analytical data collected will be of sufficient quality to support the ecological assessment for

the respective Operable Units. The investigation of Rowell Creek will be a component of the RI for Operable Units 1,2 and 7 and Operable Units, 3,4,5 and 6. Sal Taylor Creek will be added to the Rowell Creek watershed study. Caldwell Branch and Yellow Water Creek may be investigated as part of the RI for Operable Unit 5. The watershed studies will be conducted in a comprehensive manner including synoptic collection of sediment samples and biological samples and will consider all identified waste sites.

COMMENT 9:
Table 2:
The proposed grouping of Operable Units for Round 2 field work and submittal of the Draft RI/FS Report is unbalanced and therefore unacceptable. Of the three Operable Units, OU 2 will probably require the most work, since it includes 4 sites and substantial work must still be done to complete even the source delineation/characterization portion of the investigation. A more balanced work load could be obtained by investigating Ous 1 and 7 (3 sites total) concurrently, and submitting the Draft RI/FS Reports for these two Operable Units following the completion of Round 2 field work. Also, given the DNAPL contamination which was detected in the surficial aquifer at OU 7, it would be unwise to delay the selection and implementation of a groundwater remedy for this site.

RESPONSE:
Based on the information collected during execution of the EPA and FDER approved workplan and as stated in the proposed revision and rescoping document dated 10 June 1992 data gaps exist which must be addressed. Considering the DNAPL contamination present at OU 7 additional time is anticipated to completely characterize the groundwater contamination. The Navy agrees that selection of a remedy should not be delayed and will therefore submit a revised schedule which increases the time allotted for the next round of field activities at OU 7 in lieu of proposing two separate rounds. Because OU 2 requires a significant amount of work, two rounds of field work are proposed. Because OU 1 will require only one more field episode, a response decision can be expedited.

COMMENT 10:
The following comments are provided regarding the proposed schedules:

A: The schedules for Operable Units 2 and 7 include 3 rounds of field work, although the schedules do not clearly label them as such. Given the significant amount of information collected during Round 1, the Navy should be able to adequately scope the upcoming field work to complete all characterization/delineation activities during Round 2. As discussed at the May 21, 1992 RPM meeting, the workplan should include flexible sampling programs with contingencies to expand or modify sampling plans in the field to achieve the pre-determined RI goals (e.g., delineation of soil or groundwater contamination). The need for a Round 3 should not be assumed, or included in the schedules, at this point. Rather, the intent should be to anticipate the types of data gaps which are likely to arise in the field and incorporate ways for dealing with these gaps into the workplan. The need to perform a Round 3 will be regarded as failure to achieve the Round 2 goals of contaminant characterization/delineation. Round 3 should only be necessary if extremely unusual or unexpected circumstances arise during Round 2.

B. According to the schedule for Operable Unit 2, a total of 3 documents will be prepared and submitted within a 45-day period, including:

(i) Technical Memo
(ii) Chemicals of Concern
(iii) Draft Workplan (addendum)

It is assumed that these documents, or their equivalent, are what the Navy intends to "(provide) to USEPA and FDER 45 days after concurrence with the schedule changes presented in this submittal." (06/10/92 scoping document, P.9). The schedule should be modified accordingly to reflect this intent.

C. According to the schedules in the approved FY92 SMP, the Draft Proposed Plan will be submitted concurrently with the Draft Final RI/FS Report and the Draft ROD will be submitted concurrently with the Draft Final Proposed Plan for each Operable Unit. Their document submittal schedule should be incorporated into the present schedules as well.

D. According to the investigative schedule for Operable Unit 1, ecological field sampling will be performed between September and January. Given that the winter months may not be the optimal time to perform this type of sampling, it will probably be advantageous to compress this field work into the Fall of 1992.

RESPONSE:

A. The goal of the Workplan for OU 1,2 and 7 was to perform source characterization and did not include groundwater. The workplan was based on the best available historical information which proved to be insufficient as significant new information on site conditions was collected during the field program. The accurate delineation of contamination will require additional field time to fully characterize source and groundwater. As indicated in the response to comment #9 the Navy agrees to an increase in duration of the next field event for OU 7. However, given the fact that several newly discovered disposal pits are apparently present at OU 2 the Navy is planning two field events.

B. The Technical Memorandum for OU 1,2 and 7 is the only document the Navy intends to submit to EPA and FDER. This Technical Memorandum supersedes the Workplan Addendum and will describe new work activities. The chemicals of concern identified in the schedule is an internal milestone and this information will be included in the Risk Assessment.

C. Information in the Final RI/FS Report will be incorporated into Draft Proposed Plan. Writing on the Draft Proposed Plan will begin after approval of RI/FS Report.

D. The Navy concurs with EPA's comment and will strive to expedite the ecological field sampling. However, funding will not be available until November or December 1993.

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