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NAS CECIL FIELD
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LETTER AND COMMENTS ON DRAFT REMEDIAL INVESTIGATION (RISK ASSESSMENT)
FOR OPERABLE UNIT 3 (OU3) SITES 7 AND 8 NAS CECIL FIELD FL
11/8/1996
KHAFRA ENGINEERING CONSULTANTS, INC

November 8, 1996

Ms. Allison Humphris
U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
Region 4
100 Alabama Street, S.W.
Atlanta, GA 30303-3104

RE: COMMENTS ON THE DRAFT REMEDIAL INVESTIGATION (RISK ASSESSMENTS) FOR OU3, SITES 7 AND 8 NAVAL AIR STATION CECIL FIELD JACKSONVILLE, FLORIDA

Dear Ms. Humphris:

Enclosed are the review comments of the document referenced above prepared by KHAFRA ENGINEERING CONSULTANTS, INC. (KHAFRA). The comments are a part of KHAFRA's responsibilities under the Federal Facilities Regional Oversight Contract No. 68-S4-4002 for W.A. No. R804003.

KHAFRA's review comments are organized with the general comments presented first. It is likely that after all the changes are made, the risk will not substantially change. However, this risk assessment should be revised because it does not completely follow the Region 4 guidance in terms of calculation of the EPC, exposure parameters and presentation of the toxicity factors. There are multiple errors which require the risk spreadsheets to be revised.

There is a serious concern that the data used in the risk assessment is not representative of the site in terms of soil and groundwater concentrations. In fact, the risk assessment may overestimate the risks because of the selection of samples for confirmation analysis. The overestimation may not be a problem but nonetheless should be acknowledged.

Similarly, the Ecological Risk Assessment (ERA) conducted for the Cecil Field has many serious errors which need to be addressed.

1. The lack of appropriate data quality serves to invalidate any conclusions made regarding the presence of risk.
2. The ERA does not contain site specific ecological habitats present in the area, and the data in Appendix A is not focused in a manner that would allow correlation with the ERA information.

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3. According to the date on this document, this document was completed and forwarded to EPA in September 1996. However, the most current EPA guidance was not utilized in the development of this ERA. Specifically, the EPA Process Document (EPA, 1994) and Region 4 Ecological Risk Assessment Bulletins (EPA, 1995) were not utilized.

The numerous errors and assumptions contained in this ERA are of a sufficient nature to limit the qualitative or quantitative application of the ERA in the ecological risk decision-making process.

The specific comments follow the general comments and discuss specific deficiencies in order of appearance in the document.

If you have any questions, please call me or Dr. Henry Guo at (404) 525-2120.

Sincerely,

KHAFRA ENGINEERING CONSULTANTS, INC.



Elias Zewde, P.E.
Principal

EZ/vwc

Enclosures: Hard copy and Diskette