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LETTER AND U S EPA REGION IV COMMENTS TO DRAFT PROPOSED PLAN OPERABLE UNIT 6 (OU6) SITE 11 NAS CECIL FIELD FL
3/1/1998
U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

4EAD

MEMORANDUM

DATE: March 1, 1998

SUBJECT: EAD Comments on Draft Proposed Plan, Operable Unit 6, Site 11, Naval Air Station Cecil Field, Jacksonville, Florida

FROM: Karol L. Smith, Assistant Regional Counsel

TO: Deborah A. Vaughn-Wright, RPM
Base Realignment and Closure Team

This responds to your request for comments on the Draft Proposed Plan for the above-referenced site:

General Comments:

The Introductory section does not clearly identify the Navy and EPA as lead and support agencies, respectively, for the remedial action. I suggest identifying the partnering team. I also suggest specifying that NAS Cecil Field is on the National Priorities List and that the Proposed Plan is being issued to fulfill CERCLA 117(a).

Because the Proposed Plan is written with a view towards eliciting comments from the public, I suggest spelling out acronyms used for first time, e.g., volatile organic chemicals (VOCs), semi-volatile organic chemicals, (SVOCs), maximum containment levels (MCLs).

The Plan *must* identify the major ARARs associated with each option. It should be clear that the chosen alternatives meet the ARARs, or justify circumstances for a waiver.

The risks must be clearly identified and related to the levels of cleanup being undertaken.

I suggest adding a statement of the plan's purpose, i.e., identifying the preferred alternative for remedial action and reasons for the preference; describing other remedial options considered in detail in the RI/FS report; soliciting public comments on *all* alternatives; and providing information on how the public can be involved in the remedy selection process.

Specific Comments:

I suggest expanding the introductory portion to explain that the first bullet under "Why is Cleanup Needed?" concerns soil left after the earlier removal. I suggest three headings, e.g., "soil" "groundwater," and "effect of '96 removal". Explain that the earlier removal cleaned

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some soil, but not entirely, and that soil removal will diminish the source of chemicals in the groundwater.

I suggest that the site description and history on page 2 include a brief summary of Cecil Field as an NPL site, describing where and how OU 6, Site 11 fits into the cleanup as a whole. (See p. 2-8 of Plan Review guidance.)

There needs to be a rational presentation of the problem in a section summarizing site risks. The last bullet on page 2 needs to be expanded considerably to give more details from the RI/FS report regarding the source and quantification of the risks. If there is not a sufficient risk, it would be reasonable to say "no action" will be taken. It is not clear from this Proposed Plan whether there are sufficient risks to justify action or not. The section summarizing site risks should include factors identifying the extent of contamination at the site and risks posed to human health and the environment, using information developed during the remedial investigation. Other factors that should be discussed include a description of exposure pathways, potentially exposed population, environmental risks, and a description of how current risks compare to remediation goals. Though there is a table citing ranges of detection and cleanup levels for arsenic in surface and subsurface soil, DBCP in groundwater, and phenol in groundwater, there is no discussion of the carcinogenic risk levels present, if any. Nor for noncarcinogenic effects is there a discussion of how the hazard quotient exceeds the protective exposure level for the particular chemicals present.

Furthermore, there should be a conclusion at the end of the above-referenced section on site risks, that "[actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present a current or potential threat to public health, welfare, or the environment." (See Proposed Plan guidance at pp. 2-9 and 2-10). We view the absence of information on the amount of risk present and how goals for remediation will improve the situation as a significant flaw in the Proposed Plan which needs to be rectified before the Plan is issued to the public.

The discussion summarizing alternatives on page 6 should be expanded to include more information on the treatment technologies, engineering controls and quantities of waste being handled, where applicable. There **must** be a discussion of the major applicable or relevant and appropriate requirements (ARARs) associated with each alternative. The Plan should be called an Interim Plan if there is uncertainty as to whether ARARs will be met, and a Final Plan only if ARARs will be attained. There is no identification of the specific ARARs associated with any alternatives.

The plan states as its preferred alternative for groundwater cleanup "limited action" which is really natural attenuation. It would be more appropriate to describe it as that. The chosen groundwater alternative indicates that monitoring will be done to see that natural attenuation achieves remedial action goals. "Monitoring" is not acceptable as a remedy. It is an acceptable interim action. The chosen alternative has to meets ARARs, therefore, the Plan needs

to say so (or justify a waiver). If the alternative is for natural attenuation to achieve goals, the alternative should be identified as such, and should state that once the contaminants are removed or reduced to acceptable levels via natural attenuation, the alternative will meet ARARs, if this is the case.

The "Comparison of Soil and Groundwater Cleanup Alternatives" chart on page 8 indicates that all alternatives, with the exception of "no action" meet federal and state requirements. If this is an assertion that all alternatives meet ARARs, it should be stated as such.

I suggest adding a narrative section evaluating alternatives which: identifies the preferred alternatives; evaluates the two preferred alternatives against the nine criteria; and briefly compares the other alternatives with the preferred alternatives to explain the rationale for the preference. (See Proposed Plan guidance, p. 2-10) (This comment takes into account that this is a Draft Proposed Plan, and recognizes that alternatives requiring evaluation of "state agency acceptance" and "community acceptance" will be evaluated after the public comment period. The Draft Proposed Plan should state whether these criteria will be evaluated in the ROD.)

The proposed groundwater alternative, GW-2 costs $404,000 and will take thirty years to reach the cleanup goal. I suggest a brief discussion comparing this chosen alternative to alternative GW-5, air sparging, which costs slightly more ($449,000), yet will attain the cleanup goal in significantly less time (two and one half years).

Should you have additional questions on matters discussed in these comments, please feel free to call me at x29563.