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NAS CECIL FIELD
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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT RECORD OF
DECISION OPERABLE UNIT 8 (OU8) NAS CECIL FIELD FL
6/17/1998
U S EPA REGION IV



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

CTO-09D

June 17, 1998

4WD-FFB

Commanding Officer
Attn: David Porter
Department of the Navy
Southern Division
Mail Code 18B2
P.O. Box 190010
North Charleston, South Carolina 20419-9010

Subject: NAS Cecil Field , Jacksonville, Florida
Draft Record of Decision, OU8

Dear Mr. Porter:

U.S. Environmental Protection Agency, Region 4 has completed the review of the subject document. Our comments are provided below:

1. Page 1-2, 4th bullet: Typographical error, should read "processes" instead of "process".
2. Page 1-2, paragraph 1.5: This paragraph states that contaminants in groundwater may remain above regulatory standards during the remedial action, and that as a result "applicable, or relevant and appropriate requirements will not be met as a near term goal, but *may* be met as a long-term goal." (Emphasis added). Final remedial actions selected in a Record of Decision must be determined to attain each ARAR (unless an ARAR waiver is justified). See CERCLA §121(d)(2)(A) and 40 CFR § 300.430(f)(1)(ii)(B). In view of subsequent statements in the Record of Decision that the selected remedy will attain ARARs, this statement should be amended to state that ARARs will be attained. If no technical justification exists for the determination stated on pages 2-34 and 2-39 that ARARs will be attained, then: some other action which will attain ARARs must be selected; or a waiver must be justified for any ARAR which will not be attained; or the groundwater action must be designated as an "interim" action, to be followed with a "final" action or decision in full compliance with legal requirements
3. Page 2-3, last paragraph: Suggest referring to BRAC Category '6' rather than "Red".
4. Page 2-4, Figure 2-2: This figure shows several points (•) in and south of the helicopter crash area which need to be identified in the key to the figure.

5. Page 2-4, Figure 2-2: This figure includes the note "Wells proposed for monitoring are circled". While these wells may be part of the long-term remedial action monitoring program, additional groundwater monitoring points will be needed to evaluate effectiveness of the remedial actions on reducing groundwater contaminant concentrations. If I am interpreting the figure correctly, a recommended change to Figure 2-2 is to identify the wells proposed for monitoring as existing wells proposed for monitoring.
6. Page 2-6, Section 2.3: Provide dates of the RAB meeting and of the proposed plan.
7. Page 2-37, Table 2-4: The table needs to be checked for accuracy. Specifically, the "Long-Term Effectiveness" column indicates Alternative MM-4 would not be "long-term effective", yet this remedial alternative is predicted to have the shortest remedial time period.
8. Page 2-39, Section 2.9: Need to better explain how the selected alternative will act to remediate, or enhance the remediation of, the less volatile organic and metal contaminants of concern present in the source area.
9. Page 2-39, Section 2.9: The discussion on Institutional Controls should be expanded to clearly define the goals and purposes of the controls. Also, recommend adding a sentence discussing implementation of a monitoring plan for institutional controls.

If you have any questions or concerns please contact me at 404/562-8539.

Sincerely,



Deborah A. Vaughn-Wright
Remedial Project Manager

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