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NAS CECIL FIELD, FL
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT PROPOSED
PLAN FOR OPERABLE UNIT 5 (OU 5) SITE 15 BLUE 10 ORDNANCE DISPOSAL AREA NAS
CECIL FIELD FL
5/7/2007
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

CTO 39

May 7, 2007

EMAIL & US MAIL

4WD-FFB

BRAC PMO SE

Attn: Mark Davidson
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

SUBJ: EPA Comments on the Draft Proposed Plan for Operable Unit (OU) 5, Site 15
Naval Air Station, Cecil Field, Florida

Dear Mr. Davidson:

The Environmental Protection Agency (EPA) has reviewed the subject document and has the enclosed comments for your consideration. Upon consideration, please submit a Response To Comments (RTC) for our review either concurrently or separate from the revised Proposed Plan. As appropriate, please consider these comments in the draft Record Of Decision (ROD) that we are concurrently reviewing. If you have any questions, please call me at (404) 562-8549.

Sincerely,

A handwritten signature in black ink that reads "Doyle T. Brittain".

Doyle T. Brittain
Senior Remedial Project Manager

Enc.

cc: David Grabka, FDEP
Mark Speranza, TTNUS
Mike Halil, CH2MHill

EPA Comments on the Draft Proposed Plan for Operable Unit (OU) 5, Site 15

General Comments

General Comments

1. Overall most of the content in this Proposed Plan is useful and provides most of the information required by the NCP. However, the nomenclature for the Section headings and certain terms of art do not match EPA Guidance in many cases. Several of the Specific Comments below suggest use of EPA guidance terminology and adherence to the *EPA Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Documents* [OSWER 9200.1-23P, July 1999](hereinafter referred to as the Decision Document Guide) format for a Proposed Plan. The EPA, not the Navy, issued the above guidance to assist parties in complying with CERCLA and the NCP and the terms therein are consistent with terminology used in CERCLA and the NCP. Consequently, use of terms such as 'cleanup' instead of 'remedial action' and 'proposed cleanup plan' instead of 'Preferred Alternative' in many instances is inappropriate and could be confusing to the public.
2. One of the primary purposes of the Proposed Plan is to satisfy the "Community Participation" requirements of the NCP at 40 CFR 300.430(f)(2) and(3). Accordingly, use of that term as a Section heading and organization of the content of this document to clearly inform the public of their opportunity to participate in the remedy selection process is important.
3. Although the arsenic contaminated groundwater has recently been determined not to require restoration, it is EPA's understanding that the preferred alternative would include post-remedial action monitoring of groundwater (i.e., confirmation sampling) near the areas where the arsenic contaminated soils are excavated to verify that there is no adverse impact to the groundwater. This component must be included and described in several places in the document that are more specifically discussed below.

Specific Comments

1. **Major Sections** - EPA's Decision Document Guide Chapter 3 provides an outline for the major Sections and contents of the Proposed Plan. Although the Navy is not required to follow the Guide as a matter of law, the EPA believes both the names and sequence of Section Titles are important in presenting information about the Facility and Site 15, the role of the proposed remedial action in regard to the cleanup of the entire Cecil Field facility, site risks, remedial alternatives, the Preferred Alternative, and inviting Community Participation. [Reference Guide p. 3-2] The Sections that are formed as questions are not especially helpful in most instances and this style is not consistent with EPA guidance. Organization in a logical order is important.

Accordingly, EPA suggests that the names and sequence of the Sections be as follows:
Introduction, Facility Background, Site Characteristics, Scope and Role of Proposed

Remedial Action, Summary of Site Risks, Remedial Action Objectives and Cleanup Goals, Summary of Remedial Alternatives, Preferred Alternative, and Community Participation. Fortunately, most of the existing text can be located in these Sections by simply “cut and paste” editing and revising text and/or deleting the original Section titles.

2. **Add Introduction Section, Page 1** – See Chapter 3.3.1 of the EPA’s Decision Document Guide for an explanation of the content of this Section. Cut and paste the text from the “About this Document” and “What do you think?” portions of the document on Page 5 into the *Introduction* Section.
3. **Facility Description, Page 1** – Change the title of this Section to *Facility Background*. Also, add a sentence or two that references the Federal Facility Agreement and explains that cleanup at NAS Cecil Field is being performed under the CERCLA process. Suggest that the environmental restoration information be provided in separate paragraph. In addition, the list of RODs that have been approved for OUs at Cecil Field provided in the third full paragraph of the “Why is Cleanup Needed?” section should be relocated into this *Facility Description* Section or *Scope and Role of the Proposed Remedial Action* Section.
4. **Site Description, Page 1** – Change the title of this Section to *Site Characteristics*. Also, suggest adding a reference in this Section to the text box that provides a summary of the site investigation activities. [See Specific Comment #6 below.]
5. **The Proposed Cleanup Plan Text Box, Page 1** – Please rename text box as “The Preferred Alternative”. Also, add a bullet that includes post-remedial action monitoring of groundwater near the areas where the arsenic contaminated soils are excavated to verify that there is no adverse impact to the groundwater.
6. **Site History Text Box, Page 5** – Change the title of this text box to *Summary of Investigations* or *History of Site Investigations* since the bulleted references do not provide a “Site History” in the general sense but rather list RI activities.
7. **Site History Text Box, Page 5** – Separate that last bullet and add a bullet that discusses the past arsenic contaminated groundwater monitoring sampling events and data with the latest round in Feb 2007 from the newly installed well.
8. **Summary of Site Risks, Page 6** – The limited information provided in this portion of the document needs to be augmented with information from the RI Baseline Risk Assessment or FS Report. See Chapter 3.3.5 of the EPA’s Decision Document Guide for the types of key information that should be included in this Section of the Proposed Plan. Basically, the Navy needs to summarize the results of the Baseline Risk Assessment, and the land- and groundwater- use assumptions used in the analysis. In addition, the Proposed Plan should clearly link the site risks to the basis for taking action and addressing the contaminated groundwater. [See Specific Comment #9 below.]

9. **Why is Cleanup Needed?, Page 6** – Delete this title and “cut and paste” the text that relates to the “Basis For Taking Action” (except for the last paragraph that lists the RODs for OUs) into the *Summary of Site Risks* Section.
10. **What are the Cleanup Objectives and Levels?, Page 6** – Revise this title to *Remedial Action Objectives and Cleanup Goals*. Also, consider adding another RAO that addresses the post-remedial action groundwater monitoring to verify that excavation of arsenic contamination had no adverse impact to the groundwater. The monitoring would determine whether arsenic concentration exceeds Safe Drinking Water Act MCLs.
11. **Table 1, Page 6** – Revise Table title to “Surface Soil Cleanup Goals” since the both the pickup levels and soil cleanup levels are presented in the table. Are the “Recreational Pick-up Values” considered part of final cleanup levels that must be attained or rather simply performance levels that would help indicate that the site-specific cleanup levels (i.e. recreational use cleanup goals) are attained? It is EPA’s understanding that the site-specific cleanup goals were derived following guidance provided in FAC Chapter 62-777 for calculating soil CTLs and these concentrations are “to be considered” criteria. However, it appears that the “pick-up values” are a shorthand expression of the criteria in FAC 62-680 and the FDEP Technical Support document that where the 95% UCL approach is utilized maximum soil contaminant concentrations shall not exceed three times the applicable soil CTLs. Please explain origin of “pick-up values” term. Suggest that a footnote be added to the Table that explains the pick-up value concept rather than in the paragraph directly below the table. See Comment #12 below.
12. **What are the Cleanup Objectives and Levels?, last paragraph, Page 6** – This paragraph does not seem consistent with the explanation found in FDEP’s *Technical Report for Development of CTLs* document about determining whether apportioned SCTLs have been satisfied and how the two criteria must be satisfied, in particular the three-times the SCTL criteria. This paragraph appears to be an oversimplification of how those criteria are applied and more detail should be provided that explains what the actual cleanup goals are as opposed to how pick-up values are used. In other words, why is there a recreational use cleanup goal concentration established when soil is excavated to the pick-up value level? Suggest some additional clarification be provided that addresses these points. See also Comment #11 above.
13. **Cleanup Alternatives for OU 5 Site 15, Page 6** – Revise this title to *Summary of Remedial Alternatives*. Revise first sentence to replace the word ‘reviews’ with ‘presents’. Revise the second sentence to replace the word ‘cleanup’ with ‘remedial’ and replace the word ‘plans’ with ‘remedial actions’.
14. **Alternative 3A Sub-Section, Page 7** – Clarify in this paragraph whether off-site treatment to meet RCRA LDRs for contaminated soil is part of this alternative. The Draft FS indicates in several places that it is a component for RCRA hazardous wastes namely characteristically hazardous soils contaminated with lead. Should also specify the expected treatment method that the costs were based upon for this alternative.

15. **Alternative 3A Sub-Section, Page 7** – Add a sentence or two that includes post-remedial action monitoring of groundwater near the areas where the arsenic contaminated soils are excavated to verify that there is no adverse impact to the groundwater.
16. **Use of ARARs in the Evaluation Process, Page 8** – Delete this title and relocate the text to the *Evaluation of Alternatives* Section below since this information relates to ‘Compliance with ARARs’ criteria applied in the FS. [See Comment #12 below].

Revise the ARARs paragraph as follows: “ARARs are federal and more stringent State environmental requirements that on-site remedial actions are required to comply with under CERCLA Section 121(d) and the NCP [40 CFR 300.430(f)(1)(ii)(B)]. The chemical-, location-, and action-specific ARARs that were used in evaluation of the remedial alternatives and potentially apply to the remedial action for OU 5 Site 15 are listed in Section 2 of the FS Report. Each Alternative has been evaluated to determine its compliance with ARARs in accordance with CERCLA and the NCP.”

17. **Detailed Analysis of Cleanup Alternatives, Page 8** – Revise this title to *Evaluation of Alternatives*. Revise the first sentence as follows: “In accordance with CERCLA and the NCP a detailed analysis of each remedial alternative must be performed using the nine evaluation criteria listed in the NCP.” Revise the third sentence to add the phrase “in the FS Report” after the word ‘alternative’.

Although Table 2 provides summary level comparison, the absence of any text in this Section of the document summarizing the comparative analysis of each alternative against the criteria is inadequate. See Section 3.3.8 of the Decision Document Guide for guidance on what this narrative discussion in this Section should contain. At a minimum, there should be a sub-section for each of the nine criteria with a brief paragraph or two below explaining how each of the alternatives met the criteria.

18. **Detailed Analysis of Cleanup Alternatives, Page 8** – Insert the text from the three bullets listed in the “What impacts would cleanup have on the local community?” as part of the criteria paragraphs in the *Evaluation of Alternatives* Section. The bullets summarize an aspect of the detailed analysis performed as part of the FS and could be considered part of the Long-Term, or Short-Term Effectiveness, or other criteria analysis. Consequently, this information should be in the *Evaluation of Alternatives* Section under the sub-section for the appropriate criteria.
19. **Detailed Analysis of Cleanup Alternatives, Page 8** – Revise the second paragraph to read as follows: “Based upon the analysis performed by the Navy, EPA and FDEP that is documented in the FS, the Preferred Alternative, Alternative 3A, provides the best balance among the alternatives with respect to the NCP’s evaluation criteria. Relocate this sentence to the end of the *Evaluation of Alternatives* Section since it is a conclusion statement or use as the first sentence in the Preferred Alternative Section.
20. **Detailed Analysis of Cleanup Alternatives, Page 8** – Revise the first sentence of third paragraph to read as follows: “State concurrence with the Preferred Alternative was

obtained through the review and approval of the FS Report by FDEP. Community acceptance will be determined through the publication of this Proposed Plan and solicitation of their input on the Preferred Alternative during public comment period.” Revise then relocate the last sentence to the *Introduction* or the *Community Participation* Sections. Revise as follows: “During the public comment period, the Navy, EPA and FDEP welcome comments and/or suggestions on the Preferred Alternative and the other remedial alternatives that were evaluated.”

21. ***A Closer Look at the BCT’s Proposed Cleanup Plan, Page 8*** – Revise this title to *Preferred Alternative*. The Navy, as lead agency, actually develops the Preferred Alternative in conjunction with EPA and FDEP input provided while reviewing/commenting on the FS. Accordingly any reference to the BCT in this context is not accurate and should not be used in the title of this Section.
22. ***A Closer Look at the BCT’s Proposed Cleanup Plan, numbered paragraphs, Page 8*** – **Need** more detail on each component of the preferred alternative. In particular, the first numbered paragraph should reference the cleanup goals and expected treatment technology. Also, need to add numbered paragraph 3 for the post-remedial action groundwater monitoring to verify no impacts from the arsenic contaminated soil excavation activities.
23. ***A Closer Look at the BCT’s Proposed Cleanup Plan, numbered paragraph 2 re: LUCs, Page 8***– **Add the following as the last sentence of this paragraph:** “The Navy would be responsible for maintaining, reporting on and enforcing all of the LUCs as part of the remedial action.”
24. ***A Closer Look at the BCT’s Proposed Cleanup Plan, 1st full paragraph, Page 8*** – This paragraph alludes to the 5 Year Reviews required under CERCLA 121(c) and seems out-of-place especially considering the paragraph following the LUCs sub-section that also refers the 5 Year Review.

Suggest revising this sentence in conjunction with revisions to that paragraph as follows: “Since hazardous substances remain at the site above levels that allow for unlimited exposure and unrestricted use, the Navy will review the remedial action no less than every five (5) years after initiation of the remedial action per CERCLA Section 121(c) and the NCP at 40 CFR300.4309f(4)(ii). If results of the five-year reviews reveal that remedy integrity is compromised and protection of human health is insufficient, then the additional remedial actions would be evaluated by the parties and implemented by the Navy.”

25. ***A Closer Look at the BCT’s Proposed Cleanup Plan, last paragraph, Page 8*** – Replace the term ‘proposed cleanup plan’ with the term ‘Preferred Alternative in both the first and second sentences.
26. ***What impacts would the cleanup have on the local community?, Page 11*** – Delete this Section. All of the bulleted items provide information on how each of the alternatives

potentially impacts the community or other aspects of the NCP evaluation criteria. Accordingly, this information should be moved to the *Summary of Remedial Alternatives* Section. Note that the term “administrative action” in the third bullet should be replaced with the term LUCs

27. ***Why Does the BCT Recommend this Cleanup Plan?*, Page 11** – The text in the two bullets should be “cut and pasted” into either the end of the *Evaluation of Alternatives* Section or the *Preferred Alternative* Section since they relate to how well the Preferred Alternative addresses several of the criteria.
28. ***Next Steps:*, Page 11** – Revise this title to *Community Participation*. Include a sentence that directs the public to the text box “What’s a Formal Comment” and the Public Comments form for written comments.
29. ***Glossary of Terms*, Page 11** – This should a separate attachment at the end of the document or provided in a text box that is referenced earlier in the document such as in the *Summary of Remedial Alternatives* Section or *Preferred Alternative* Section.
30. ***Comments Form*, Page 14** – Suggest addition of a *Public Comments Form* title at the top of the page.