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NAS CECIL FIELD, FL
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LETTER OF TRANSMITTAL AND U S EPA REGION IV REVISED COMMENTS ON DRAFT
RECORDS OF DECISION FOR OPERABLE UNIT 5 (OU 5) SITE 15 AND OPERABLE UNIT 9
(OU 9) SITE 59 NAS CECIL FIELD FL
7/11/2007
U S EPA REGION IV



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

CTO 39

July 11, 2007

EMAIL & US MAIL

4WD-FFB

BRAC PMO SE

Attn: Barbara Nwokike

4130 Faber Place Drive

Suite 202

North Charleston, SC 29405

SUBJ: Additional and/or Revised EPA Comments on the Draft RODs for OU 5/ Site 15, and
OU 9/ Site 59; NAS Cecil Field, Florida

Dear Ms. Nwokike:

The Environmental Protection Agency (EPA) has reviewed the subject documents and has the enclosed comments which we ask be addressed. If you have any questions, please call me at (706) 355-8710.

Sincerely,

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

Doyle T. Brittain
Senior Remedial Project Manager

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

**Additional and/or Revised EPA Comments on the Draft RODs for
OU 5/ Site 15 and OU 9/ Site 59; NAS Cecil Field, Florida**

Comments on Draft ROD for OU 5/ Site 15

1. **Revised EPA Comment #42** – The LUC performance objectives provided in the second paragraph of Section 2.10.2.3 are not adequate and should be revised to be consistent with the draft LUC RD. Please delete the second sentence of the second paragraph and replace with the following text (or some variation) and bulleted LUC performance objectives.

“The LUCs (including enforceable deed restrictions and notice of LUCs to local government agencies) will implemented to meet the following LUC performance objectives:

- Prohibit residential, industrial, commercial, agricultural (specifically growing crops for human consumption), and medium- and high-intensity recreational reuse of the Site unless prior written approval is obtained from the Navy, EPA, and FDEP. Prohibited residential uses shall include, but are not limited to, any form of housing, child-care facilities, pre-schools, elementary schools, secondary schools, playgrounds, convalescent, or nursing care facilities. Prohibited high-intensity recreational activities include, but are not limited to, playgrounds, athletic fields, etc. Prohibited medium-intensity recreational activities include, but are not limited to, picnic grounds, camping, etc. Allowable low-intensity recreational activities include hiking, biking, horseback riding, hunting, etc.;
 - Prohibit the excavation of soils from the Site unless prior written approval is obtained from the Navy, EPA, and FDEP; and
 - Maintain the integrity of any existing or future monitoring or remediation system(s) unless prior written approval is obtained from the Navy, EPA, and FDEP.”
2. **EPA Comment #46** – After consultation with EPA Headquarters, the Region reiterates that the Navy should incorporate the suggested revisions provided in EPA Comment #46 related to LUC Checklist item #7.
 3. **EPA Comment #47** – After consultation with EPA Headquarters, the Region reiterates that the Navy should incorporate the suggested revisions provided in EPA Comment #47 related to LUC Checklist item #8.
 4. **Revised EPA Comment #48** – Revise the first sentence by replacing the word ‘comment’ with the word ‘approval’ and add the following phrase to the end of the sentence: “, a primary document as provided in the Cecil Field FFA.”

5. **New EPA Comment on Figure 2-7** – Please explain the difference between the “Controlled Land Use Parcel” and “NAS Jacksonville Controlled Land Use Parcel”? If the NAS Jacksonville Controlled Land Use Parcel is not part of Site 15 and then consider revising the legend and map to only include the Site 15 parcel that requires LUCs per this selected remedy.

Comments on Draft ROD for OU 9/ Site 59

1. **EPA Comment #39** – After consultation with EPA Headquarters, the Region reiterates that the Navy should incorporate the suggested revisions provided in EPA Comment #39 related to LUC Checklist item #7.
2. **EPA Comment #40** – After consultation with EPA Headquarters, the Region reiterates that the Navy should incorporate the suggested revisions provided in EPA Comment #40 related to LUC Checklist item #8.
3. **Revised EPA Comment #41** – Revise the first sentence of the fourth paragraph to Section 2.10.2.3 by replacing the word ‘comment’ with the word ‘approval’ and add the following phrase to the end of the sentence: “, a primary document as provided in the Cecil Field FFA.”
4. **New EPA Comment on Figure 2-10** – The boundary of the Controlled Land Use Parcel must include the highlighted groundwater treatment system areas since one of the LUC performance objectives is to "Maintain the integrity of any existing or future monitoring or remediation systems..." In addition, the boundary of the Controlled Land Use Parcel should include the entire areas of the contaminated groundwater plumes that exceed cleanup goals. Consequently, the shaded area representing the controlled land use parcel should be enlarged on the map to encompass the treatment systems and these plumes.