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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 9 (OU 9) SITE 59 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 359

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) 9, Site 59
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,

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) 9, Site 59

General Comments

1. Overall most of the content in this Proposed Plan is useful and provides 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. 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 Figures 2-6 provide important information of the extent of groundwater contamination, EPA questions the usefulness of all of these Figures in the Proposed Plan. Does the Public need to have all three levels of groundwater contamination depicted or can the Navy instead provide one or two Figures depicting the extent of the TCE plumes?

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 is important in presenting information about the Facility and Site 59, 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 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 9 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 relocated into this *Facility Description* Section or *Scope and Role of the Proposed Remedial Action* Section.

4. ***Facility Description*, last two sentences, Page 1** – Please revise the sentences to indicate whether the Navy initially transferred title to the property or used a Lease-in-Furtherance with the LRA. If not yet transferred, indicate whether the Navy intends to transfer title to Site 59 and who is the expected Grantee.

5. ***Site Description*, Page 1** – Change the title of this Section to *Site Characteristics.* Suggest that some of the referenced figures be eliminated and/or consolidated so that the TCE groundwater contamination is depicted in one figure. [See General Comment #3] 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.]

6. **Site History Text Box, Page 9** – 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. ***Summary of Site Risks,* Page 10** – 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 #8 below.]

8. ***Why is Cleanup Needed?*, Page 10** – 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.

9. ***What are the Cleanup Objectives and Levels?*, Page 10** – Revise this title to *Remedial Action Objective and Cleanup Goals.* Content of this Section is adequate.

10. ***Cleanup Alternatives for OU 9 Site 59*, Page 10** – 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'.

11. ***Use of ARARs in the Evaluation Process*, Page 11** – 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 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 9 Site 59 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."

12. ***Detailed Analysis of Cleanup Alternatives*, Page 11** – 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.

13. ***Detailed Analysis of Cleanup Alternatives*, Page 11** – 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.

14. ***Detailed Analysis of Cleanup Alternatives*, Page 11** – 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 4A, 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. [See Comment #16 below]

15. ***Detailed Analysis of Cleanup Alternatives*, Page 11** – 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."

16. ***A Closer Look at the BCT's Proposed Cleanup Plan*, Page 11** – 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 is this context is not accurate and should not be in the title of this Section.

17. ***A Closer Look at the BCT's Proposed Cleanup Plan*, Monitoring sub-section, 1st paragraph, last sentence, Page 14** – This sentence seems presumptuous with regard to determining whether the remedial action is considered complete by the parties, especially considering there are other components of the remedial action. Accordingly, revise as follows: "Once the COC concentrations in groundwater meet the cleanup levels, the Navy, EPA and FDEP will evaluate this portion of the remedial action to determine whether the remedial action objective has been met and whether monitoring can be discontinued." Relocate this revised sentence to the end of this sub-section.

18. ***A Closer Look at the BCT's Proposed Cleanup Plan*, Monitoring sub-section, 2nd and 3rd paragraphs, Page 14** – Are the downgradient wells referred to in the second paragraph the same wells as the "sentinel wells" referred to in the third paragraph? If so, suggest combining these two paragraphs and revising as follows: "Monitoring would also include the use of three downgradient wells (designated as sentinel wells) at the leading edge of the plumes to evaluate potential COC migration. If analysis of groundwater collected from these sentinel wells indicates that the cleanup levels have been exceeded, the Navy, EPA and FDEP will undertake additional sampling and modeling. Depending on the results, the parties will evaluate whether additional remedial actions are required to address the contamination and consider amending the remedy." Delete the lettered sub-paragraphs since content addressed in the revised paragraph suggested above.

19. ***A Closer Look at the BCT's Proposed Cleanup Plan*, Monitoring sub-section, last paragraph, Page 14** – 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. Potential actions could include additional in-situ chemical treatment or expansion of biological in-situ treatment of the plume(s)."

20. ***A Closer Look at the BCT's Proposed Cleanup Plan*, LUCs sub-section, Page 14 –** Revise as follows: "LUCs such as deed restrictions and notice to local government agencies would be implemented to prevent use of the contaminated groundwater from Site 59. The Navy would provide written notice of the contamination and a request to the St. Johns River Management District to not issue permits to persons requesting installation of a groundwater well into the surficial aquifer at Site 59. In addition, annual site inspections would be conducted to verify the continued implementation and compliance with the LUCs, in particular the deed restrictions. The Navy would be responsible for maintaining, reporting on and enforcing all of the LUCs as part of the remedial action."

21. ***A Closer Look at the BCT's Proposed Cleanup Plan*, last paragraph, Page 14 –** Replace the term 'proposed cleanup plan' with the term 'Preferred Alternative in both the first and second sentences.

22. ***Why Does the Navy and U.S. EPA Recommend this Cleanup Plan?*, Page 15 –** Delete this title the first sentence as well as the first bullet since it is not accurate to state that contaminated groundwater does not present an unacceptable risk, otherwise there would be no need for undertaking a remedial action. The text in the remaining 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.

23. ***Next Steps*:, Page 15 –** 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.

24. ***Glossary of Terms*, Page 15 –** 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.

25. **Comments Form, Page 18 –** Suggest addition of a *Public Comments Form* title at the top of the page.