

N00213.AR.000295
NAS KEY WEST
5090.3a

LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT
CORRECTIVE MEASURES STUDY REPORTS FOR SOLID WASTE MANAGEMENT UNITS 5
AND 7 NAS KEY WEST FL
7/14/1998
U S EPA REGION IV

7046 0042 55

0042 IC IC

RECEIVED
7-17-98

0042 IC

JUL 14 1998

CARBON COPY

4WD-FFB

Mr. Dudley Patrick
Code 1858
Southern Division Naval Facilities Engineering Command
P.O. Box 190010
Charleston, S.C. 29419-9010

SUBJ: Naval Air Station (NAS) Key West, Florida
EPA ID# FL6 170 022 952

Dear Mr. Patrick:

EPA has reviewed the following documents:

- o **Draft Corrective Measure Study Report for SWMU 5 - Naval Air Station Key West**; Brown & Root, Env., April 1998
- o **Draft Corrective Measure Study Report for SWMU 7 - Naval Air Station Key West**; Brown & Root, Env., April 1998

and has enclosed its comments with this letter. If you have any questions, please contact me at 404/562-8533.

Sincerely,

Martha Berry
Remedial Project Manager
Federal Facilities Branch

Enclosures

cc: Jorge Caspary, FDEP
Ron Demes, NAS Key West
Phillip Williams, NAS Key West
Charles Bryan, TtNUS
Roy Hoekstra, Bechtel

EPA Comments
Draft SWMU 5 CMS
Brown & Root Environmental
April 1998

1. **Page 1-6, Figure 1-2.** The scale in this figure is not accurate and should be modified accordingly. Also, Sigsbee Key is still labeled Dredgers Key on this map.
2. **Page 3-6, Section 3.2.1.4, Paragraph 3.** Executive Order 11988, Statement of Proceedings on Floodplain Management, should be considered as a potential location-specific ARAR or To-Be-Considered (TBC).
3. **Page 3-13, Last full paragraph.** There is a typo in the first sentence - it is SWMU 5, not SWMU 7.
4. **Page 5-2, Section 5.1.2, 2nd to last paragraph.** Please clarify what is meant by "FDEP residential criteria".
5. **Section 5.1.2, General.** The description of Alternative 2 would benefit from the addition of a figure showing where the institutional controls would apply.
6. **Page A-2, Appendix A, Section A.1.2.2, Alternative 2.** This section states the assumptions associated with enacting institutional controls. This section assumes that trespassers would make a concerted effort to avoid ingestion or contact with the media because of the hazard postings and that occupational workers would be required to spend less time at the site. Both assumptions rely on half of the original "no action" exposure durations. According to the assumption in this section, occupational workers would be required to spend half as much time at the site as normal. Procedures for tracking this would be required. If institutional controls are adopted as a part of the remedy, then procedures for tracking this should be developed as a part of remedy implementation.
7. **Page 1 of 2, Appendix C, Alternative 3.** The costing spreadsheet, Line Item 4.1, Confirmatory Sampling Analysis, indicates that metals and polychlorinated biphenyls (PCBs) are to be analyzed. This conflicts with the text of the report and the Annual Costs sheets within Appendix C, which indicate only inorganics analyses. It is recommended that the reference to PCBs be removed from the costing spreadsheet.

EPA Comments
Draft SWMU 7 CMS
Brown & Root Environmental
April 1998

1. **Page 1-6, Figure 1-2.** The scale in this figure is not accurate and should be modified accordingly. Also, Sigsbee Key is still labeled Dredgers Key on this map.
2. **Page 2-12, Section 2.5.2.2, General.** It is unclear how mercury was included in Section 2.5.2.1 under Surface Water (Future Resident Scenario) utilizing EPA Region IV criteria, but omitted in Section 2.5.2.2 Surface Water (Future Resident Scenario) utilizing FDEP criteria. Generally, state criteria are equal to or more stringent than Federal criteria. Clarification should be provided.
3. **Page 3-5, Section 3.2.1.4, General.** Executive Order 11988 Statement of Proceedings on Floodplain Management should be considered as a potential location-specific ARAR or To-Be-Considered (TBC).
4. **Page 3-10, Section 3.3, Last Paragraph.** The HI for surface water under the future resident scenario is 2, yet surface water is eliminated as a media of concern. Further justification for the elimination of the surface water pathway should be provided.
5. **Page 3-13, Section 3.5, First Paragraph.** The referenced section should be Section 3.4.2, not Section 3.2.
6. **Section 5.1.2, General.** The description of Alternative 2 would benefit from the addition of a figure showing where the institutional controls would apply.
7. **Page 5-2, Sections 5.1.2, First Paragraph.** This section indicates that groundwater is to be monitored only for inorganics. However, the cost analysis also includes analyses for PCBs. This discrepancy should be resolved.
8. **Appendix A, Page A-2, Section A.2.2, Alternative 2.** This section states the assumptions associated with enacting institutional controls. This section assumes that trespassers would make a concerted effort to avoid ingestion or contact with the media because of the hazard postings and that occupational workers would be required to spend less time at the site. Both assumptions rely on half of the original "no action" exposure durations. According to the assumption in this section, occupational workers would be required to spend half as much time at the site as normal. Procedures for tracking this would be required. If institutional controls are adopted as a part of the remedy, then procedures for tracking this should be developed as a part of remedy implementation.

9. **Appendix C, Page 1 of 1, Alternative 2.** This costing worksheet summarizes the costs associated with Alternative 2. A total of \$90.00 was estimated for labor with respect to Warning Sign placement. However, as seen in the spreadsheet, this amount was not multiplied by the associated labor overhead, and other indirect costs. This discrepancy should be corrected.