

10/14/05-04920



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
SAM NUNN ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, S.W.  
ATLANTA, GEORGIA 30303

October 14, 2005

Mr. Roger Jackson  
NAVFAC Atlantic  
NC/Caribbean IPT, Code OPCEV  
6505 Hampton Blvd.  
Bldg C, 3<sup>rd</sup> Floor  
Norfolk, VA 23508-1278

SUBJ: MCAS Cherry Point  
Draft PRAP  
Operable Unit 5

Dear Mr. Jackson:

The Environmental Protection Agency (EPA) has completed its review of the above subject document. Comments are enclosed. If there are any questions, I can be reached at (404) 562-8538.

Sincerely,  
**Dawn C.  
Taylor**

Digitally signed by Dawn C. Taylor  
DN: cn=Dawn C. Taylor, c=US,  
o=Federal Facilities Branch, ou=U.S.  
EPA Region 4, email=taylor.dawn@epa.  
gov  
Date: 2005.10.13 19:33:04 -04'00'

Gena Townsend  
Senior Project Manager

cc: George Lane, NCDENR  
Jeff Christopher, MCAS Cherry Point

**COMMENTS ON MCAS CHERRY POINT  
OPERABLE UNIT 5  
DRAFT PRAP (9/05)**

1. Section 5.0, Summary of Site Risks: Because this PRAP encompasses a final remedial decision for all media in OU 5, this risk summary section should address risk determinations for all media. One means of achieving this requirement would be to insert the following three sentences between the existing introductory paragraph's second sentence (beginning "The RI Report provides ...") and its third sentence (beginning "Constituents in groundwater ..."):

*The RI concluded that no unacceptable risks to human health or the environment were present in surface water or sediment at Sites 1 and 2 or in soils at Site 2. Subsequently, in the course of developing the 2005 Focused FS for OU 5, it was concluded that no unacceptable risks were present in soils at Site 1. Accordingly, the only OU5 medium containing contamination posing potentially unacceptable risks is ground water.*

2. Section 7.2, Alternative 2 – Institutional Controls: In the initial paragraph, replace the entire fourth sentence (beginning "Specifically, the IC would consist of a Notice ...") with the following sentence:

*Specific types of ICs to be employed will include: 1) the MCAS Cherry Point master planning process; 2) a deed Notice of Inactive Hazardous Substance or Waste Disposal filed in the Craven County real property records per NCGS 130A-310.8; and 3) deed restrictions included in any deed transferring any portion of OU 5 to any non-Federal transferee.*

3. Section 7.4, Alternative 4 – MNA with ICs: At the end of the initial sentence, replace the words "... except for monitoring" with "except for the minimal exposures to personnel performing work related to monitoring."
4. Section 8.0, Evaluation of Alternatives: In the initial paragraph, identify the document in the Administrative Record (the Focused FS?) where details about the "quantitative preliminary screening of the five groundwater alternatives" may be found.
5. Section 8.2, Relative Evaluation of ARARs: Replace the entire second sentence (beginning "Alternatives 1, 3, and 4, may not meet ...") with the following sentence: "Alternatives 1, 3, and 4 are all expected to meet chemical-specific ARARs eventually as contamination is reduced by processes of natural attenuation."
6. Section 9.0, Preferred Alternative: After the final word in the initial paragraph's second sentence, add "until the remediation goals have been achieved."

7. Section 9.0, Preferred Alternative: Immediately after the initial paragraph's second sentence (as revised per the comment above), insert the following two sentences:

*For any institutional controls (ICs) selected in the Record of Decision (ROD) for this action, the Navy will include a Land Use Control Implementation Plan (LUCIP) specifying IC implementation details as part of the Remedial Design post-ROD document the Navy submits to the USEPA and NCDENR for review. Upon final approval by USEPA and NCDENR, the LUCIP will establish IC implementation and maintenance requirements enforceable under CERCLA.*

8. Section 9.0, Preferred Alternative: In the initial paragraph's next-to-last sentence (beginning "One such response..."), change "when remediation goals have been achieved during ..." to "when the Navy, USEPA, and NCDENR agree that remediation goals have been achieved during ...."