

N60200.AR.003018
NAS CECIL FIELD, FL
5090.3a

LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT TECHNICAL
MEMORANDUM FOR NO FURTHER ACTION AT POTENTIAL SOURCE OF
CONTAMINATION 44 NAS CECIL FIELD FL
7/30/2001
U S EPA REGION IV



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

July 30, 2001

4WD-FFB

Commander
Department of the Navy
SOUTHNAVFACENGCOM
Attn: Mark Davidson, 1879
P.O. Box 190010
North Charleston, SC 29419-9010

Subject: Draft Technical Memorandum for No Further Action, Potential Source of Contamination 44, Ditch from DRMO to Wastewater Treatment Plant, NAS Cecil Field, Jacksonville, FL.

Dear Mr. Davidson:

The U.S. Environmental Protection Agency has reviewed the subject document dated June 2001. Generally the draft report is adequate for its intended purpose. Below are our comments.

1. Page 2-1, Section 2-1, Last Sentence. Is military reuse considered the same as industrial reuse?
2. Page 2-1, Section 2.2. UNF 6 and Building 15 are both discussed. However, it is unclear if these two areas were investigated as part of PSC 44 or if they will be addressed separately. A review of my files has found that the State and EPA have approved no further action for Building 15 (1/14/00 and 11/22/99). These determinations are based on a Sampling and Analysis Report for Building 15 dated November 1999. This information should be added to this discussion. Per correspondence received from the State (2/5/99), UNF 6 was to be included as part of PSC 44. The EPA (7/19/99) approved a no further determination for UNF 6 in conjunction with reviewing the Jacksonville Port Authority FOST. The BCT should discuss the current condition of UNF 6 and verify whether any further action is required at this site.
3. Figure 4-2. The Legend indicates the presence of monitoring wells, however, none were found on the map. Please add any wells if they are present or delete this from the Legend.

4. Page 5-1, Section 5.0. Please include Region 9 PRGs on Tables 5-3 and 5-4.
5. Section 6.2. It unclear if the SERA was conducted on pre- or post- removal levels. If the SERA was based on pre-removal levels, then the findings may not be reflective of current conditions. Many of the COC's could possibly be eliminated.
6. EPA has received the comment letter from the University of Florida dated June 28, 2001. Please keep us informed of the resolution of their comments.

Thank you for the opportunity to review this draft document. EPA concurs with the draft reports findings that the removal action was protective of human health and the environment and that the requirements of the Action Memorandum dated June 27, 2000, have been met. If you have any questions regarding my comments please contact me at 404/562-8539.

Sincerely,



Deborah A. Vaughn-Wright
Remedial Project Manager

cc: David Grabka, FDEP
MarkDavidson, SOUHDIV
MarkSperanza, TTNUS