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NAS CECIL FIELD, FL  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT ENGINEERING  
EVALUATION/COST ANALYSIS FOR POTENTIAL SOURCE OF CONTAMINATION 32 MAIN  
BASE HAZARDOUS MATERIALS WAREHOUSE/STORAGE AREA NAS CECIL FIELD FL

9/20/2001

U S EPA REGION IV



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

September 20, 2001

4WD/FFB

Commander  
Attn: Mr. Mark Davidson  
Mail Code ES339  
Department of the Navy  
SOUTHNAVFACENGCOM  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

Subject: Draft Engineering Evaluation/Cost Analysis (EE/CA) for Potential Source of Contamination (PSC) 32, Main Base Hazardous Materials Warehouse/Storage Area, Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document dated July 1001 and have the following comments:

1. The two remedial alternatives that would be protective of human health and the environment are Alternative 2 and Alternative 3. Alternative 2, Institutional Controls and Monitoring, is the least costly of the two alternatives. A Land Use Control Implementation Plan (LUCIP) is to be prepared to prevent unrestricted development and monitoring would continue for 30-years at a five year frequency. Monitoring of land use controls should be more frequent. Annual monitoring is recommended. At present the five-year frequency is adequate for ground water monitoring.
2. Text should be added to the EE/CA concerning what actions will be taken if the recommended alternative is inadequate to protect human health and the environment and the Chemical of Concern (COC) start leaching into the groundwater and/or spread beyond the confines of the DRMO storage area. Also, text should be added to address contingencies if the land use controls (institutional controls) are breached.
3. Page 2-22, Section 2.4.1.2: Due to the proximity of the site to the drainage ditch which leads directly to Lake Fretwell, please explain potential ecological risks via this pathway.
4. Page 2-8, Section 2.4.1: "The BCT decided to conduct a removal action to address potential exposures, to address hazardous substances that may pose a threat of release, and to comply with the reuse planned for this area." Some soil samples remaining on site after excavation activities ~~have been completed~~ may have concentrations ...."
5. PSC 32 is one of many sites which comprise Operable Unit 12. Please add Operable Unit 12 to the title and provide a reference to OU 12 within the text.