N60200.AR.003099
NAS CECIL FIELD, FL
5090.3a

LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT PROPOSED PLAN FOR OPERABLE UNIT 10 (OU 10) SITE 25 NAS CECIL FIELD FL
10/2/2001
U S EPA REGION IV

CTO 78 Site 25
PP

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

October 2, 2001

4WD/FFB

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

Subject: Draft Proposed Plan for Operable Unit 10, Site 25, Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document. The document was reviewed using the "Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents", dated July 1999 (http://www.epa.gov/superfund/resources/remedy.rods/index.htm). Our comments follow:

1. Page 1, Site Description. Add current and future land use to the site description

2. Page 1, Site Description, 1st paragraph, 3rd sentence. "Transformer" should be plural.

3. Page 1, Site Description. Add a physical description of the site, especially any features which may impact remedy implementation.

4. Page 4, Why is Cleanup Needed. Add a description of how this site and OU fit into the overall site strategy.

5. Page 5, A Closer Look at the BRAC Cleanup Team's Proposal. Add a #6 which address the standard statement which is now recommended for all Proposed Plans by EPA. " Based on information currently available, the Navy believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among the other criteria with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): (1) be protective of human health and the environment; (2) comply with ARARs; (3) be cost effective; (4) utilize permanent solutions to the maximum extent

practicable; and (5) satisfy the preference for treatment as a principal element.

6. Page 5, Summary of Site Risks. Need further detail on exposure pathways and targets; current and future use of groundwater.

7. Page 5, Summary of Site Risks. Add the standard statement " It is the BCT's judgement that the preferred alternative identified in this Proposed Plan is necessary to protect public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment."

8. Page 5, Summary of Site Risks, 3rd paragraph, last sentence. "Therefore, the soil ....were not evaluated for an ecological risk assessment."

9. Format: Recommend shifting the description of Groundwater Cleanup Alternatives to before the section titled " A closer Look at the BRAC Cleanup Team's Proposal". This will help with the flow of the fact sheet/Proposed Plan.

10. Need to identify the ARARs evaluated. Reference to the Feasibility Study is not sufficient. Especially since the Feasibility Study is not final at this time and would not be available for review in the repository.

11. The Feasibility Study should be finalized before we proceed with the Proposed Plan.

12. Page 8, Why Does the BRAC Cleanup Team Recommend this Proposed Plan? Add a 4th bullet: Alternative 2, Natural Attenuation, Institutional Controls and monitoring is the preferred alternative. This alternative is recommended because it will achieve risk reduction by using natural attenuation for the groundwater and by providing safe management of the remaining groundwater contamination until cleanup goals are met. This alternative costs less than other alternatives and reduces risk in an acceptable time frame.

13. Table 2, Cost. Add a breakdown of the costs to include long term monitoring operation and maintenance, construction and annual operations.

14. Table 2, Community Acceptance. Add a statement that the Restoration Advisory Board has been briefed (July 2001).

15. Table 2, Nine Criteria. Provide a more detailed evaluation of the alternatives using the nine criteria. The current format is too general and does not provide sufficient information on how the alternatives meet or fail the nine criteria.

16. The Table of Acronyms is wasted space. Recommend substituting a "Glossary of Technical Terms" this basically would serve the same purpose and provide useful information for the public. See attached example.

If you have any questions, please contact me at 404/562-8539 or at vaughn-wright.debbie@epa.gov.

Sincerely,

Deborah A. Vaughn-Wright

Deborah A. Vaughn-Wright
Remedial Project Manager

enclosure

cc: David Grabka, FDEP
Scott Glass, SOUTHDIV
Mark Speranza, TTNUS

vanadium, and zinc were detected at concentrations exceeding average concentrations in upgradient areas of the White Oak River Basin. The inorganics are suspected to be the result of metals precipitation accumulated within the surface water as evaporation occurs.

SCOPE AND ROLE OF PROPOSED RESPONSE ACTION

The Proposed Remedial Action Plan for Site 65 is a "No Action" alternative. This alternative is supported by the conclusion of the RI, that there were no releases of hazardous substances from the waste disposal areas that resulted in a risk to human health or the environment.

SCOPE AND ROLE OF PUBLIC PARTICIPATION

The public is encouraged to review and comment on the PRAP and other documents pertaining to Site 65. This information is found in the Administrative Record file available for review at www.bakerenv.com/camplejeune and the following locations:

Onslow County Public Library
58 Doris Avenue East
Jacksonville, NC 28540
Mon. - Thurs. 9:00 a.m. to 9:00 p.m.
Fri. - Sat. 9:00 a.m. to 6:00 p.m.

MCB, Camp Lejeune
Installation and Environmental Division
Building 58, Room 238
Marine Corps Base
Camp Lejeune, NC 28542

MCB, Camp Lejeune will hold a public information meeting on July 18, 2001 at the Coastal Carolina Community College at 7:00 p.m. The 30-day public comment period will begin on July 11 to August 10, 2001 to aid in the selection of a final remedial alternative.

POINTS OF CONTACT

To provide written comments to the PRAP, please contact either:

Mr. Kirk Stevens, Code EV23
Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699
(757) 322-8422

or

Mr. Neal Paul, Head, Installation Restoration Branch
Installation and Environmental Division
AC/S EMD (IRD)
Building 58
Marine Corps Base, PSC Box 20004
Camp Lejeune, NC 28542-0004
(910) 451-5068

GLOSSARY OF TECHNICAL TERMS

HI - A hazard index is an index indicating non-carcinogenic risk to humans by comparing contaminant concentrations at a site to USEPA guideline concentrations for acceptable risk. An HI greater than 1.0 indicates a potential non-carcinogenic risk to human health.

ICR - Incremental cancer risk values represent the probability of a person getting cancer in one's lifetime due to exposure to carcinogenic contaminants. The USEPA acceptable carcinogenic risk range is $1x10^{-4}$ to $1x10^{-6}$. An ICR value greater than $1x10^{-4}$ indicates a potential carcinogenic risk to human health.

Inorganics - Those substances not containing carbon in their chemical make-up. Most inorganics are naturally occurring in the earth's crust.

PAH - Polynuclear aromatic hydrocarbons are a group of molecules consisting of a ring or chain of rings of carbon atoms that result from the incomplete burning of organic material such as coal, oil and gas, or garbage. Some PAHs are manufactured and used in coal tar, crude oil, creosote, and roofing tar. Different PAHs can biodegrade in soil at varying rates, depending on specific molecular properties.

PCB - A polychlorinated biphenyl is a man-made organic molecule consisting of rings of carbon with chlorine atoms attached. PCBs are persistent in the environment (not mobile or easily biodegraded) and can accumulate in living tissue.

Risk Assessment - An evaluation of all chemicals detected above the USEPA provided screening values, with respect to potential harm to human health.

SSSV - Surface soil screening values are federal listed contaminant concentrations and literature values used for comparison to determine if there is a potential ecological risk due to contaminants in surface soil.

SSV - Sediment screening values are state and federal listed contaminant concentrations and literature values used for comparison to determine if there is a potential ecological risk due to contaminant in sediment.

SVOC - A semivolatile organic compound is made of carbon chains that are not light enough to evaporate easily. They are commonly found in plastics, tar, asphalt, paints, and fuels.

SWSV - Surface water screening values are state and federal listed contaminant concentrations used for comparison to determine if there is a potential ecological risk due to contaminants in surface water.

VOC - A volatile organic compound is an organic (contains carbon) compound which readily evaporates.