

N60200.AR.003105  
NAS CECIL FIELD, FL  
5090.3a

LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT RECORD OF  
DECISION FOR OPERABLE UNIT 10 (OU 10) SITE 25 FORMER TRANSFORMER STORAGE  
YARD NAS CECIL FIELD FL  
10/11/2001  
U S EPA REGION IV



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

October 11, 2001

4WD/FFB

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

Subject: Draft Record of Decision 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. Our comments were sent earlier via email; however, for your convenience they are also attached.

If you have any questions, please contact me at 404/562-8539 or at [vaughn-wright.debbie@epa.gov](mailto:vaughn-wright.debbie@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Deborah A. Vaughn-Wright".

Deborah A. Vaughn-Wright  
Remedial Project Manager

enclosure

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

# Summary of Comments on Cover.PDF

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## Page: 4

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Sequence number: 1

Author: dvaughn

Date: 10/11/01 7:11:10 AM

Type: Note

TABLE OF CONTENTS:

Add a Section for Current and Potential Future Site and Resource Uses within Section 2.5

## Page: 9

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Sequence number: 1

Author: dvaughn

Date: 10/11/01 7:11:53 AM

Type: Note

SECTION 1.1:

Add EPA ID Number: "FL5 170 022 474"

Sequence number: 2

Author: dvaughn

Date: 10/11/01 7:12:03 AM

Type: Note

SECTION 1.1:

Please locate the site relative to the bounds of Cecil Field (for example, northeast corner).

Sequence number: 3

Author: dvaughn

Date: 10/11/01 7:11:38 AM

Type: Note

SECTION 1.3:

Add "The response action selected in this Record of Decision is necessary to protect the public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment."

Sequence number: 4

Author: dvaughn

Date: 10/10/01 12:52:27 PM

Type: Strikeout

If not addressed by

implementing the response actions selected in this ROD, this release may present an imminent and substantial endangerment to public health, welfare, or the environment. Unacceptable human health risks could result from exposure to the surficial aquifer groundwater at Site 25.

## Page: 10

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Sequence number: 1

Author: dvaughn

Date: 10/10/01 3:03:41 PM

Type: Strikeout

By separate Memorandum of Agreement (MOA) dated September 7, 1999 with USEPA and FDEP, NAS Cecil Field, on behalf of the Department of the Navy (DON), agreed to implement base-wide, certain periodic site inspection, condition certification, and agency notification procedures designed to ensure the maintenance by Navy personnel of any site-specific land use controls (LUCs) deemed necessary for future protection of human health and the environment. A fundamental premise underlying execution of that agreement was that through the Navy's substantial good-faith compliance with the procedures called for therein, reasonable assurances would be provided to USEPA and FDEP as to the permanency of those remedies that included the use of specific LUCs.

Although the terms and conditions of the MOA are not specifically incorporated or made enforceable herein by reference, it is understood and agreed by the Navy, USEPA and FDEP that the contemplated permanence of the remedy reflected herein shall be dependent upon the Navy's substantial good-faith compliance with the specific LUC maintenance commitments reflected therein. Should such compliance not occur or should the MOA be terminated, it is understood that the protectiveness of the remedy may be

## Page: 11

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Sequence number: 1

Author: dvaughn

Date: 10/11/01 7:12:51 AM

Type: Note

SECTION 1.7:

Please provide assurances that Scott Glass has authority to sign the ROD on the behalf of Southern Division.

Sequence number: 2

Author: dvaughn

Date: 10/11/01 7:12:37 AM

Type: Note

SECTION 1.7:

Add a signature line for:

Richard D. Green

Director

Waste Management Division

US EPA Region 4

Sequence number: 3

Author: dvaughn

Date: 10/10/01 3:03:46 PM

Type: Strikeout

reconsidered and that additional measures may need to be taken to adequately ensure necessary future protection of human health and the environment.

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Sequence number: 1

Author: dvaughn

Date: 10/11/01 7:13:18 AM

Type: Note

SECTION 2.1:

Insert (FL5 170 022 474)

## Page: 21

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Sequence number: 1

Author: dvaughn

Date: 10/11/01 7:13:51 AM

Type: Note

SECTION 2.5:

Please identify the Chemicals of Concern. Although the ROD identifies contaminants, it is unclear whether the concentration of these contaminants rises to the level of a chemical of concern.

Sequence number: 2

Author: dvaughn

Date: 10/11/01 7:13:41 AM

Type: Note

SECTION 2.5:

State whether the contamination has the potential to migrate and if so, whether human or ecological populations could be affected by the migration.

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Sequence number: 1  
Author: dvaughn  
Date: 10/11/01 7:14:22 AM  
Type: Note

SECTION 2.8:

Reference the ARAR table when first referring to ARARs in this section. Also, the ROD must correlate ARARs with a specific remedy considered.

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Sequence number: 1  
Author: dvaughn  
Date: 10/11/01 7:15:18 AM  
Type: Note

SECTION 2.8:

Please include a more detailed cost itemization for each remedy considered. Additionally, since contamination will remain in place for the No Action alternative, five year reviews must be included. Currently no costs are identified with this remedy.

Sequence number: 2  
Author: dvaughn  
Date: 10/11/01 7:15:31 AM  
Type: Note

SECTION 2.8:

The No Action alternative discusses short term risks, rather than short term effectiveness. Please correct.

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Sequence number: 1  
Author: dvaughn  
Date: 10/11/01 7:24:38 AM  
Type: Note

SECTION 2.10.2:

Insert the following: "Restrictions and controls will be coordinated with the NAS Cecil Field reuse implementation plan, and will be included in all deeds and leases. The deed restrictions and site controls to be applied under this alternative are as follows: Land use controls are part of the selected remedy for Site 25, and shall be implemented through a land use control implementation plan (LUCIP). The LUCIP shall be developed as part of the remedial design. The timing and nature of the monitoring and reporting of the land use controls shall be specified in the LUCIP as well as enforcement responsibilities.

However, to remain protective, land use controls depend on annual monitoring, and maintenance of fences and signs (if applicable). The results of the annual evaluation shall be reported to FDEP and EPA. The deed restrictions will add a layer of protection against future use of the surficial groundwater that will augment any zoning restrictions.

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Sequence number: 1  
Author: dvaughn  
Date: 10/11/01 7:25:04 AM  
Type: Note

SECTION 2.10.4:

Insert the following bullet: " As part of the Remedial Design, a LUCIP will be developed. This portion of the Remedial Design will detail how the land use controls in the selected remedy will be implemented, maintained, and monitored by the Navy over time. As a planning document pursuant to a ROD, the LUCIP will be enforceable by any party under CERCLA.

Sequence number: 1

Author: dvaughn

Date: 10/11/01 7:25:32 AM

Type: Note

SECTION 2.11:

Insert " Land use controls are protective of human health since exposure to contamination is controlled. Deed restrictions, which will be instituted and controlled by the lead federal agency separate from the impact of local politics, provide an extra layer of prevention against groundwater usage and the drilling of wells into or through the contaminated aquifer.