

N60200.AR.003116  
NAS CECIL FIELD, FL  
5090.3a

LETTER REGARDING U S EPA REGION IV REVISED COMMENTS ON DRAFT PROPOSED  
PLAN FOR OPERABLE UNIT 10 (OU 10) SITE 25 NAS CECIL FIELD FL  
10/22/2001  
U S EPA REGION IV



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

October 22, 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: Revised Comments - 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) reviewed the subject document and provided initial comments October 2, 2001. After further review of the draft Proposed Plan a major deficiency was noted. Any description of a remedial action which is to include the use of institutional controls must include the following elements:

1. The purpose of the institutional control;
2. The type of institutional control;
3. How the controls will be implemented;
4. How the controls will be enforced along with the entity responsible; and
5. Frequency of monitoring of the institutional control.

The proposed plan must include all of these elements prior to approval by the EPA.

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 initial comments follow:

1. Page 1, Site Description. Add current and future land use to the site description
2. Page 1, Site Description, 1<sup>st</sup> paragraph, 3<sup>rd</sup> 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, 3<sup>rd</sup> 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 4<sup>th</sup> 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](mailto:vaughn-wright.debbie@epa.gov).

Sincerely,



Deborah A. Vaughn-Wright  
Remedial Project Manager

enclosure

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