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NAS CECIL FIELD, FL
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT PROPOSED PLAN FOR
OPERABLE UNIT 11 (OU 11) SITE 45 NAS CECIL FIELD FL
11/18/2002
U S EPA REGION IV



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

November 18, 2002

4WD/FFB

Commander
Department of the Navy
SOUTHNAVFACENGCOM
Attn: Scott Glass, Code ES3SG
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: Draft Proposed Plan for Operable Unit 11, Site 45
Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Glass:

The NAS Cecil Field BCT has been in informal dispute awaiting resolution on issues pertaining to institutional controls and post Record of Decision (ROD) authority on the national level. For this reason, the Environmental Protection Agency (EPA) Region 4, has not provided the BRAC Cleanup Team (BCT) and the Navy with written comments pertaining to the Proposed Plan. Recent communications between the Department of Defense and EPA indicates that these issues have been resolved or are nearing resolution.

The Navy was provided comments to the draft proposed plan for OU 10, site 25, October 22, 2001. During the January 2002, BCT EPA relayed to the team that essentially the comments for the Site 25 proposed plan can be applied to the Site 45 proposed plan. That statement is still true. This letter provides written comments specific to the Site 45 proposed plan dated November 2001.

The OU 11, Site 45 Draft Proposed Plan 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, About This Document. Add a statement that the Proposed Plan is a document that the lead agency is required to issue to fulfill the requirement of CERCLA §117(a) and NCP §300.430(f)(2). Currently only CERCLA §117 is referenced.
2. Page 1, Site Description. Add current and future land use to the site description. The current site description has past and future use. What is at the site now?
3. Page 1, Site Description. A statement should be added indicating that the current and future planned reuse for the site impacted the remedy selection.

4. Page 1, About This Document. "One of the purposes of this plan is to solicit the public's views..... described. The Navy may modify the Preferred Alternative or select another response action presented in this Plan based on new information or public comments. Therefore, the public is encouraged to review and comment on all alternatives presented in this Proposed Plan."
5. Page 4, 1st column. The reader is referred to the Administrative Record. However, no address is provided. Later in the draft plan the reader is referred to the information repository. Since the Administrative Record can be found in the Information Repository, this should be made clear to the reader.
6. Page 4, What do you think. When this does go final please change the year to the correct year.
7. Page 4, Why is Clean-up Needed. Add a description of how this site and OU fit into the overall NAS Cecil Field strategy.
8. Page 4, Summary of Site Risks. This section should be expanded to include a description of potentially exposed populations in current and future risk scenarios. What are the exposure pathways (e.g. direct ingestion of potable groundwater, exposure to soils, etc.). The Summary of Site Risks should link the site risks to the basis for action.
9. Page 5, Clean-up Alternatives for OU 10, Site 21. This heading should be OU 11, Site 45.
10. Page 5, Clean-up Alternatives. Identify the preferred clean-up alternative at the beginning of this section.
11. Page 5, Soil Clean-up Alternative, No Action. Add "No restrictions on the use of the property would be imposed."
12. Page 5 and 6, Limited Action. Recommend changing the name of the alternatives from limited action to "Monitoring".
13. Page 5, Soil Clean-Up Alternative, Limited Action. "Soil would be regularly sampled and analyzed to monitor any decrease in COCs concentrations as a result of natural attenuation the level of contamination in the groundwater by measuring COC levels."
14. Page 5, Removal and Disposal. Identify the conditions which would trigger treatment of the soil by low temperature thermal desorption or chemical fixation, as proposed in this section. Is the excavated soil likely to be hazardous? State how this remediation waste will be handled. Why were these contingency remedies not mentioned in the draft ROD?
15. Page 6, Groundwater Clean-up Alternatives, No Action. Suggest adding to the end of the paragraph "and no restriction would prevent access to groundwater contamination."
16. Page 6, Groundwater Clean-up Alternatives, Limited Action, last sentence. "...health, additional active remedial measures..."
17. Table 2, Soil Alternative 2, Compliance with ARARs. The proposed plan states that Alternative 2 does not comply with chemical-specific ARARs for the short term. Please verify. Are there chemical specific ARARs for soils? What are they? The Feasibility Study only showed 'to be considered' ARARs. Will the ARARs be met in the long term?
18. Table 3, Summary Comparative Analysis of Groundwater Cleanup Alternatives. Recommend striking "eventually" comply. Either the ARAR will or will not comply. Statute says "at the completion of the remedial action."
19. Page 5, Table 1. Provide the Federal MCLs as well as PRG's. If MCL's are not available, so state.

20. Page 11, Why Does the BCT Recommend this Proposed Plan. Recommend adding a fourth bullet: This alternative is recommended because it will achieve risk reduction by using natural attenuation for groundwater and by imposing restrictions on access to contaminated groundwater until clean-up goals are met.
21. Table 2 and 3, Summary of Costs is appropriately broken down into capital, operation and maintenance and net present worth. However, with respect to the costs associated with soil and groundwater alternatives #2, are the costs presented truly representative? Since the clean-up goals may not be reached for 900-1300 years, an estimate of the potential lifetime of the remedy should be presented.
22. Table 2 and 3 do not cover all nine criteria. Please add the analysis for State/Support Agency acceptance and Community acceptance. When was the Restoration Advisory Board briefed on this proposed plan?
23. Page 6, A Closer Look at the BCT's Proposed Plan. Institutional Controls. This section should be expanded to include a description of purpose of the institutional control, type of institutional controls, how the controls will be implemented, who will be the responsible entity, and frequency of institutional control monitoring.
24. Page 11, Next Steps. The BCT does not review and sign the ROD. The Navy and EPA signs and reviews the ROD. Will the Navy or the BCT announce the decision. I believe it should be the Navy. The BCT is a partnership between three agencies, but it is the Navy, EPA and FDEP who will be doing the various reviews, announcements, signing, etc. Recommend replacing BCT with Navy and EPA where ever appropriate.

Should you have any questions with regard to this letter, please contact me at 404/562-8539 or at vaughn-wright.debbie@epa.gov.

Sincerely,



Deborah A. Vaughn-Wright
Remedial Project Manager

cc: Mark Davidson, SOUTHDIV, Code ES339
David Grabka, FDEP
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Paul Malewicki, J.A. Jones