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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT PROPOSED PLAN FOR
OPERABLE UNIT 5 (OU 5) SITE 49 FORMER SKEET RANGE NAS CECIL FIELD FL
2/18/2004
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

February 18, 2004

4WD/FFB

Commander
Department of the Navy
NAVFAC EFD SOUTH
Attn: Mark Davidson
Mail Code ES33
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: Draft Proposed Plan for Operable Unit 5, Site 49, Former Skeet Range, Naval Air Station Cecil Field, Jacksonville, Florida (FL5170022474)

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document. The draft was reviewed using "A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents", July 1999. Our comments follow:

1. In general, we found this proposed plan difficult to read. The format of the proposed plan does not follow that provided in the Guidance. The Navy need not adhere strictly to that format, but at a facility where we expect to review several more proposed plans, it would facilitate the review if the format follows the Guidance.
2. The document seems, more than usual, to omit explanation of concepts and to use acronyms, both which limit the informing function of the document. The document could be improved with minor additions/changes. Here is an example, from "Why No Further Action Was Selected": "Areas of soil where concentrations of PAHs (BaP and BaPEq) and lead exceed either the FDEP SCTLs for leachability to groundwater or three times the FDEP SCTLs for residential exposure have been excavated and disposed at a Subtitle D landfill." The acronyms have been spelled out in an earlier section, but the reader must flip back past three diagrams to find them. "SCTLs" should probably be in **boldface** to be consistent with the practice of "bolding" the acronym where it is defined. It might be easier to locate the definition of the acronym if just the acronym were in boldface and to only boldface the acronym when it is defined, and not as it is repeated later in the document. Also, a brief explanation of "leachability" and "Subtitle D landfill" would be useful information for the reader.
3. About This Document. This section should include a statement that the Proposed Plan has been prepared to satisfy the public participation requirements under

CERCLA and the NCP, perhaps by substituting "order to satisfy" for "accordance with" in the first sentence. The BCT is not, strictly speaking, selecting the remedy. The sentence reading "The BCT, in consultation with the **Restoration Advisory Board (RAB)** will select a final remedy for OU 5, Site 49 after public comments have been addressed." should be revised to read, "The Navy and EPA, in consultation with the State will select a final remedy for OU 5, Site 49 after public comments have been addressed." The input of the RAB can be described in a follow-up sentence, such as, "The Restoration Advisory Board (**RAB**), made up of [describe the make-up of the RAB] have participated in the development of the decision reflected in this document."

4. The Proposed Cleanup Plan. Because this section is presented as a highlight, it would be a good idea to define IRA in this section. Since EPA will be a co-selector of the remedy, the last sentence should read, "FDEP concurs with the proposed clean-up plan."
5. Why No Further Action Was Selected. Third bullet: Please clarify whether "negligible or low risks to ecological receptors" satisfies being protective of ecological receptors. The section "Site Description" states that part of the excavated soil was disposed of in a hazardous waste disposal site. This section mentions only a Subtitle D landfill. Please clarify.
6. Next Steps. The BCT will not sign the ROD. Please change to reflect that the Navy and EPA will sign the ROD.
7. Site History. Please clarify the term "grey site." Please spell out the acronyms in this section. The use of highlights nicely breaks up the document, but this break up also invites the reader to read the document other than straight from front to back; the reader might not be sure where to look for definition. However, if the acronym is boldfaced the **first** time, and only the first time, it may reduce reader fatigue.
8. Throughout the proposed plan an IRA (interim removal action) is referenced. "Interim" is only used when subsequent removal actions are expected to be performed. Because the removal action was final and the site is now considered eligible for unrestricted reuse, please clarify.
9. Please provide the hours of operation for Building 907.

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

Sincerely,



Deborah A. Vaughn-Wright
Senior Remedial Project Manager

Cc: David Grabka, FDEP
Mark Speranza, TTNUS
Mike Halil, J.A. Jones