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NAS CECIL FIELD, FL
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT FIVE YEAR REVIEW
DATED MAY 2000 NAS CECIL FIELD FL
6/27/2000
U S EPA REGION IV

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4



61 Forsyth Street
Atlanta, Georgia 30303-3104

June 27, 2000

4WD/FFB

Commander

Attn: Mr. Mark Davidson

Mail Code 1879

Department of the Navy

SOUTHNAVFACENGCOM

P.O. Box 190010

North Charleston, South Carolina 29419-9010

Subject: Draft Five-Year Review, Naval Air Station Cecil Field, Jacksonville, Florida
dated May 2000

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document dated May 2000. The revised report has been greatly enhanced and our earlier comments appear to have been addressed. However, a review of the May 2000 version has identified a few areas that still need clarification. Our comments follow:

1. Page 1-8: Building 907 is listed as the information repository. Is this correct?
2. Page 2-14. The new section states that the BCT approved recommendation to cease further collection of benthic macroinvertebrates. This does not seem accurate. Please double check meeting minutes. I recall continuing monitoring for Chironmus tentans. Let's discuss further at the next team meeting.
3. Report wide: Tables listing changes in the ARAR/Site-Specific cleanup levels may refer to the U.S. EPA region III Screening Levels. Region 4 has adopted using Region 9 Screening Levels. The Region 9 screening levels should be used instead of Region 3.
4. Report wide: Every section which discusses Land Use Controls uses the same wording, "These institutional controls, designed to ensure protection of human health and the environment will be completed when the Navy transfers the property to the XXXX. The XXXX must adopt these LUCIPs by way of deed restrictions, notices, or other agreements. The current and future land use at these sites suggests that these controls should be effective."

This discussion is not accurate. The institutional controls are not completed at the time of transfer. They are completed (or may be removed) once clean-up goals are reached. Suggested rewording: "These institutional controls, designed to ensure protection of human health and the environment, will be completed. When the Navy transfers the property to the XXXX, the XXXX must adopt these LUCIPs by way of deed restrictions, notices, or other agreements must be adopted. The current and future land use at these sites suggests that these controls should be effective."

5. Page 3-1, 2nd paragraph: The point regarding conducting 5-year reviews will be conducted until clean-up levels are achieved resulting in unlimited use and unrestricted exposure. Surface soils were remediated to meet residential and ecological risk scenarios. Subsurface soils, however, may meet leachability criteria but may not meet industrial or residential scenarios. Land use controls will need to be in place for subsurface soils. The current long term monitoring plan is for groundwater only. Recommend the BCT discussing a need for a long term subsurface soil monitoring plan to determine if or when these controls may be lifted
6. Report wide: Tables listing changes to ARAR/Site Specific Levels . The Navy should consider carefully the consequences of adopting changes in the clean-up levels. The resulting depending on the type of changes adopted either a Rod Amendment or an Explanation of Significant Differences (ESD) may be required.
 - A. If adoption of the NAS Cecil Field Inorganic Background Data Set (IBDS) is being recommended, the BCT must look at the change in potential clean-up costs. If adopting the IBDS results in a change in remedy or in the cost of the remedy of over 50%, then a ROD Amendment will be required. If the change results less than 50% change then an ESD will be required to document the change.
 - B. If the clean-up levels specified in the ROD are still protective, but the BCT decides to adopt more stringent criteria, an ESD or RA may not be required. To clean-up to lower levels than what is required in the ROD is always allowable. However, the new levels may not enforceable under the current ROD and the public will not be party to the decision to clean-up to lower levels.
 - C. If the clean-up levels specified in the ROD are still protective, the BCT may not adopt less stringent clean-up levels unless clean up to the new standards requires a change in the remedy. Any change in the remedy must be accomplished through a ROD Amendment.
7. Report wide: In the recommendations and required actions section, suggest adding to the table whether an ESD or RA will be required.
8. Page 9-1, Next Review: Need to double check this date. Does the clock start when this report is completed or does it stay on schedule when it was originally due based on the first IROD.

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

Sincerely,



Deborah A. Vaughn-Wright
Remedial Project Manager

cc: Mike Deliz, FDEP
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