N60200.AR.008679
NAS CECIL FIELD
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EMAIL REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FINAL SITE MANAGEMENT PLAN FOR CALENDAR YEAR 2012 NAS CECIL FIELD FL
11/16/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Jonnet, Mark

From: Grabka, David <David.Grabka@dep.state.fl.us>
Sent: Wednesday, November 16, 2011 3:29 PM
To: Simcik, Robert; Sanford, Art F CTR OASN (EI&E), BRAC PMO SE; Davidson, Mark E CIV OASN (EI&E), BRAC PMO SE; Martin, Stacin CIV NAVFAC LANT, EV; Vaughn-Wright.Debbie@epamail.epa.gov; Michael.Halil@CH2M.com; keenerj@solutions-ies.com; Jonnet, Mark; Boerio, Megan
Cc: Nuzie, Eric
Subject: RE: Cecil Field _ Draft Final Site Management Plan for Calendar Year 2012 _ electronic submission
Attachments: ESD_20040526.pdf

Team,

I looked over the Draft Final SMP for Calendar Year 2012 (received by e-mail November 15, 2011). Only a few things.

(1) Should the Draft Final SMP be dated November 2011 (it currently says September 2011)?

(2) In Table 1-1 (page 2 of 18), OU 1, Site 2, Remedial Action Objective column, "and" is misspelled "aand".

(3) An October 2003 ESD was done that covered a bunch of sites but is not mentioned anywhere. It probable should as it is a Decision Document. I have attached.

(4) In Table 1-3 (page 15 of 15), the two MRA sites are described with the petroleum program sites, which they are not. They should either be added to the IR Program sites chart or they should have their own.

Otherwise, the report looks fine. Let me know if you have any questions regarding these comments.

Thanks,

David P. Grabka, P.G.
Remedial Project Manager
Florida Department of Environmental Protection
Federal Programs Section
Bureau of Waste Cleanup
Phone: (850) 245-8997

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.

From: Simcik, Robert [mailto:Robert.Simcik@tetratech.com]
Sent: Tuesday, November 15, 2011 2:57 PM
To: Sanford, Art F CTR OASN (EI&E), BRAC PMO SE; Davidson, Mark E CIV OASN (EI&E), BRAC PMO SE; Martin, Stacin CIV NAVFAC LANT, EV; Vaughn-Wright.Debbie@epamail.epa.gov; Grabka, David; Michael.Halil@CH2M.com; Jessica Keener (keenerj@solutions-ies.com); Jonnet, Mark; Boerio, Megan; Simcik, Robert
Subject: Cecil Field _ Draft Final Site Management Plan for Calendar Year 2012 _ electronic submission

Team, attached is the revised electronic submission of the Draft Final SMP. This submission replaces yesterday's submission and has incorporated the requested corrections. This version will replace the current version posted to the Cecil Field DWS. Upon final approval a revised hard copy will be place in the library.

If you have any questions, please let us know.

Thanks, Rob.

Robert Simcik P.E. | Project Manager
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Thanks, Rob

Installation Restoration Program
October 2003

Declaration for the Explanation of Significant Differences
Naval Air Station Cecil Field
Jacksonville, Florida

Statment of Purpose

An Explanation of Significant Differences (ESD) is required at nine sites at Naval Air Station (NAS) Cecil Field, Jacksonville, Florida to modify their respective Records of Decision (RODs) to support implementation of land use controls (LUCs) required as part of their remedial actions.

Introduction

NAS Cecil Field was established in 1941 and provided facilities, services, and material support for naval operations. In 1989, NAS Cecil Field was placed on the National Priorities List (NPL). In July 1993, the Base Realignment and Closure (BRAC) Commission recommended the closure of the Facility. On September 30, 1999, NAS Cecil Field was closed, and the majority of the flightline was transferred to the Jacksonville Airport Authority (formerly the Jacksonville Port Authority). In September 2000, most of the remainder of NAS Cecil Field was transferred to the City of Jacksonville. The Navy is the lead agency, with oversight from the United States Environmental Protection Agency (U.S. EPA) and Florida Department of Environmental Protection (FDEP), for cleanup of sites in the Installation Restoration Program (IRP) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as modified by the Superfund Amendments and Reauthorization Act (SARA).

This ESD provides enforceable LUC provisions that are to become part of the ROD for each site. The ESD is issued for the following sites at NAS Cecil Field:

- Operable Unit (OU) 1, Site 1 – Old Landfill and Site 2 – Recent Landfill
- OU 2, Site 5 – Oil Disposal Area Northwest and Site 17 – Oil/Sludge Disposal Pit Northwest
- OU 3, Site 8 – Boresite Range, Hazardous Waste Storage Area, and Firefighter Training Area
- OU 7, Site 16 – AIMD Seepage Pit
- OU 8, Site 3 – Oil/Sludge Disposal Pit
- OU 9, Site 36 – Control Tower TCE Plume and Site 37 – Hangars 13 and 14 DCE Plume

The Navy is issuing this ESD for nine sites at NAS Cecil Field as part of the public participation requirements under Section 117(c) of CERCLA, Section 300.435(c)(2)(l) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and the Navy Installation Restoration (IR) Program. In accordance with Section 300.825(a)(2) of the NCP, this ESD will become part of the Administrative Records for OUs 1, 2, 3, 7, 8, and 9. The Administrative Record for NAS Cecil Field sites is included as part of the Information Repository, which is available for review during regular business hours at Building 907, Cecil Commerce Center, 13357 Lake Newman Street, Jacksonville, Florida, 32252, (904) 573-0336. The Administrative Record also contains background information on all of the nine sites that was used in determining the original remedies and in preparing this ESD.

Selected Remedies

The Navy and U.S. EPA, in conjunction with FDEP, selected cleanup remedies, as summarized in Table 1, for these sites as documented in the following Records of Decision (RODs):

- September 1995 ROD for OU 1, Sites 1 and 2
- January 2000 Amended ROD for OU 2, Site 5
- September 1995 ROD for OU 2, Site 17
- July 1999 ROD for OU 3, Site 8
- April 1999 Amended ROD for OU 7, Site 16
- January 1998 ROD for OU 8, Site 3
- January 2001 ROD for OU 9, Sites 36 and 37

Basis for the Document

Prior to Base closure in 1999, LUC provisions generally were not included in RODs. For RODs with LUCs issued after closure of the Base until June 2003, the basis for ensuring implementation of LUC procedures was the Memorandum of Agreement (MOA) signed by the Navy, U.S. EPA, and FDEP on September 7, 1999. A fundamental premise of the MOA was that through the Navy's substantial good-faith compliance with the procedures called for therein, reasonable assurances

would be provided to U.S. EPA and FDEP as to the permanency of those remedies that included LUCs. Although the terms and conditions of the MOA were not incorporated into or made enforceable by reference into the RODs, it was understood and agreed by the Navy, U.S. EPA, and FDEP that the permanence of the remedy as described in the RODs was dependent of the Navy's substantial good-faith compliance with specific LUC maintenance committed as specified in the MOA.

Based on discussions between the Department of Defense (DoD) and U.S. EPA Headquarters, it was decided that specific, enforceable LUC language was required as part of the ROD for any site at which LUCs were a part of the selected remedy. FDEP also provided input into the LUC language for sites at NAS Cecil Field. An agreement was reached that required LUC language to be a formal part of RODs with a LUC component. This ESD documents the incorporation of these specific, enforceable LUC requirements into RODs that were finalized prior to this agreement.

After the changes documented in this ESD are implemented, the final cleanup remedies will still be as indicated in Table 1 and will continue to be protective of human health and the environment. The Navy has obtained concurrence from the U.S. EPA and FDEP on the modifications to the cleanup remedies for these sites.

Description of Significant Differences

This ESD documents a modification to the RODs for these nine sites that significantly changes, but does not fundamentally alter, the selected remedies. The only significant differences in the remedies as detailed in the RODs are the incorporation of formal LUC language as an enforceable component of each ROD. A summary of the LUCs to be implemented at each site is provided in Table 1.

Soil and/or groundwater contamination remains at the nine sites included in this ESD at concentrations that preclude unrestricted reuse; therefore, the remedies include LUCs to prevent unacceptable risk. The areas to which LUCs are applied are shown in Figures 1 through 7. LUC performance objectives, as outlined below, will be incorporated, as appropriate, into the deeds and other land use control mechanisms for each of the nine sites.

- Residential reuse will be prohibited at OU 1, Sites 1 and 2.
- Agricultural land use is prohibited at OU 2, Site 5.
- Excavation, disturbance, or removal of surface soil cover is prohibited at OU2, Site 5.
- Excavation and uncontrolled removal of soil with contaminant concentrations greater than applicable criteria, without prior written approval from the Navy, U.S. EPA, and FDEP, will be prohibited at OU 1, Sites 1 and 2 (surface and subsurface), OU 2, Site 5 (subsurface), and OU 8, Site 3 (surface and subsurface).
- Consumption of groundwater that exceeds federal Maximum Contaminant Levels (MCLs) or State GCTLs will be prohibited at OU 1, Sites 1 and 2, OU 2, Sites 5 and 17, OU 3, Site 8, OU 7, Site 16, OU 8, Site 3, and OU 9, Sites 36 and 37.
- All use of groundwater from the surficial aquifer underlying the site (including, but not limited to, dewatering, irrigation, heating/cooling purposes, and other industrial processes), without prior written approval from the Navy, U.S. EPA, and FDEP, will be prohibited at OU 1, Sites 1 and 2, OU 2, Sites 5 and 17, OU 3, Site 8, OU 7, Site 16, OU 8, Site 3, and OU 9, Sites 36 and 37.
- The integrity of existing remediation system(s) will be maintained at OU 7, Site 16, OU 8, Site 3, and OU 9, Sites 36 and 37.
- The integrity of monitoring wells will be maintained at OU 1, Sites 1 and 2, OU 2, Sites 5 and 17, OU 3, Site 8, OU 7, Site 16, OU 8, Sites 3, and OU 9, Sites 36 and 37.
- At OU 1, Sites 1 and 2, disturbance of the landfill cover, adjacent wetlands, concrete survey monuments, and Rowell Creek sediment will be prohibited.
- At OU1, Sites 1 and 2, the morphological setting of the portion of the Site 2 tributary and Rowell Creek that is aiding in the natural attenuation of the contamination from the site will be protected.
- At OU 7, Site 16, breaching of the storm sewer line at the site will be prohibited.
- At OU 8, Site 3, disturbance of Rowell Creek sediments will be prohibited.

These LUCs shall be maintained for as long as they are required to prevent unacceptable exposures to contaminated media or to preserve the integrity of the remedy. The Navy or any subsequent owners shall not modify, delete, or terminate any LUC without U.S. EPA and FDEP concurrence. The LUCs shall be maintained until the concentrations of hazardous substances in soil and/groundwater have been reduced to levels that allow for unlimited exposure and unrestricted reuse.

The Navy will be responsible for implementing, inspecting, reporting, maintaining, and enforcing the LUCs described in this ESD in accordance with the approved LUC Remedial Design. Although the Navy may later transfer these procedural responsibilities to another party by contract, property transfer agreement,

or through other means, the Navy shall retain ultimate responsibility for remedy integrity. Should this LUC remedy fail, the Navy will ensure that appropriate actions are taken to reestablish its protectiveness and may initiate legal action to either compel action by a third party(ies) and/or to recover the Navy's costs for remedying any discovered LUC violation(s).

The LUC Remedial Design will be prepared as the LUC component of the Remedial Design. Within 90 days of ESD approval, the Navy shall prepare and submit to U.S. EPA and FDEP for review and approval, a LUC Remedial Design that shall contain implementation and maintenance actions, including periodic inspections. The Navy will implement, report, maintain, monitor, and enforce the LUCs according to the LUC Remedial Design.

Support Agency Comments

This section will be completed as part of the final ESD.

Statutory Determinations

The proposed changes to the selected remedies will continue to satisfy the statutory requirements of CERCLA Section 121. The modified remedies remain protective of human health and the environment, comply with federal and State applicable or relevant and appropriate requirements (ARARs), and continue to be cost effective.

Public Participation

Public participation requirements as outlined in the NCP, Section 300.435 (c)(2)(i) have been met.

For More Information

If you have questions or would like further information about the ESD for these nine sites at NAS Cecil Field, please contact:

Commander
Department of the Navy
Southern Division
Naval Facilities Engineering Command
Attn: Mr. Jeffrey Meyers, P.E., CHMM (Code ES3)
2155 Eagle Drive
North Charleston, South Carolina 29406
Phone: 843-820-5609
Fax: 843-820-5563
E-mail: meyersjg@navfac.navy.mil

Declaration

The issuance of this ESD for nine sites at Naval Air Station Cecil Field is concurred with and recommended for immediate implementation:

United States Department of the Navy:

Jeffrey Meyers 11-24-03

Mr. Jeffrey Meyers, P.E., CHMM — Date
Base Realignment and Closure
Environmental Coordinator

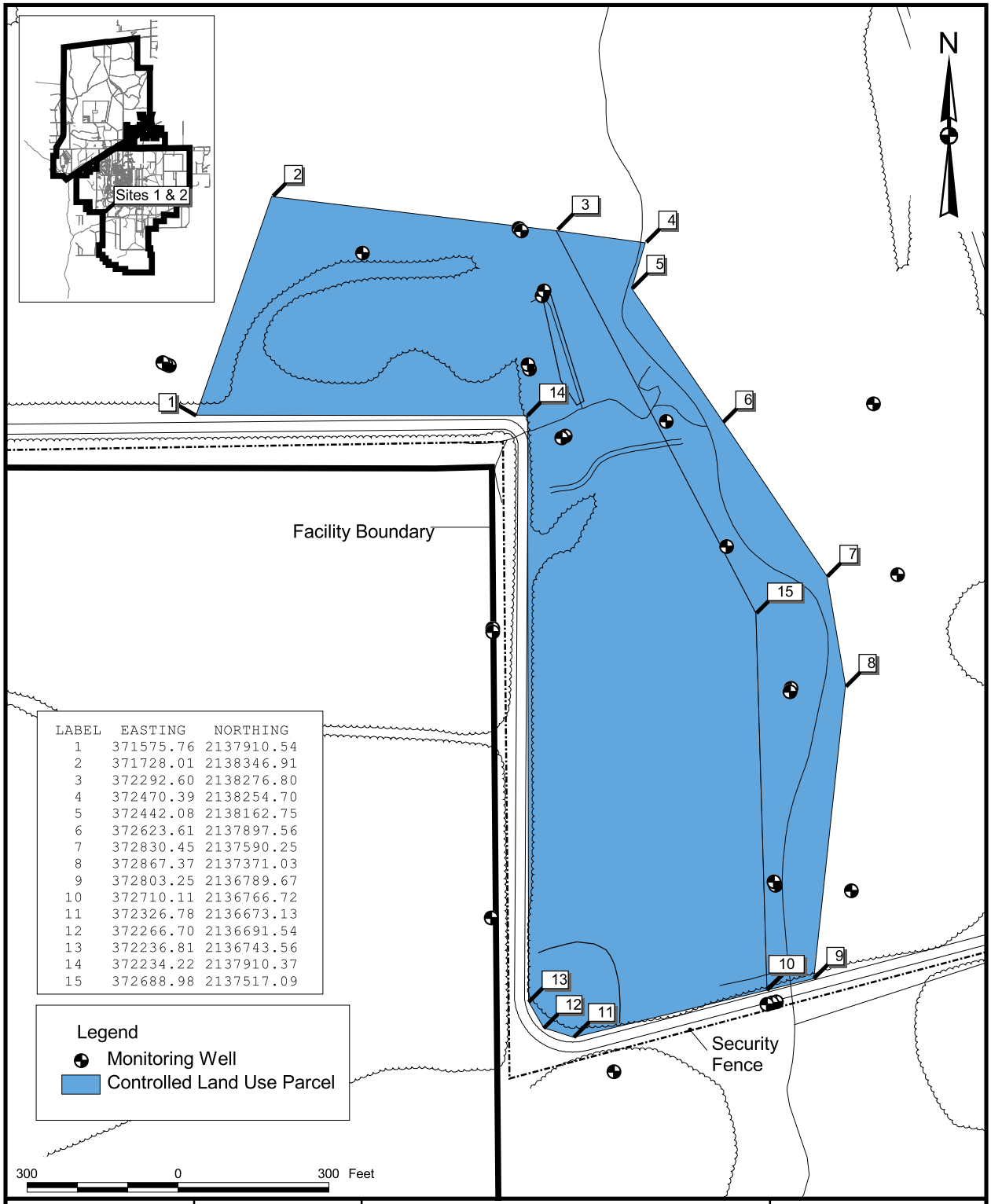
United States Environmental Protection Agency:

Winston A. Smith 11-13-03

Winston A. Smith — Date
Director
Waste Management Division
U.S. EPA Region 4

TABLE 1
SUMMARY OF SELECTED REMEDIES AND LAND USE CONTROL REQUIREMENTS
EXPLANATION OF SIGNIFICANT DIFFERENCES - 9 SITES
NAVAL AIR STATION CECIL FIELD
JACKSONVILLE, FLORIDA

SITE	CONTAMINANTS OF CONCERN	SUMMARY OF REMEDY	LUC SUMMARY
OU 1, Sites 1 & 2	Surface water/sediment Inorganics	Landfill closure and biomonitoring Landfill gas, unexploded ordanance, and radiological surveys Removal of surface debris Groundwater, surface water, and sediment monitoring Development and implementation of a post-closure plan Soil and groundwater use restrictions Identification of bacteria in drainage structure and Site 2 Tributary Sampling of benthic invertebrates	Prohibit residential land use Prohibit groundwater use for all purposes Prohibit disturbance of monitoring wells Prohibit disturbance of surface/subsurface soils and sediments Prohibit disturbance of adjacent wetlands Prohibit disturbance of landfill cover Prohibit disturbance of concrete survey monuments Prohibit excavation, drilling, or otherwise disturbing vegetative cover Prohibit distrubance of the morphological setting of adjacent wetlands, Site 2 tributary, and Rowell Creek.
OU 2, Site 5	Subsurface Soil TRPH PCBs Groundwater VOCs, SVOCs, TPRH, pesticides, inorganics	Soil Excavation and biotreatment of contaminated soil Excavation and off-site disposal of contaminated soil and sediment Use restrictions Groundwater Natural attenuation Monitoring Use restrictions	Prohibit excavation, disturbance, or removal of surface soil cover (2 feet) Prohibit agricultural land use Prohibit groundwater use for all purposes Prohibit disturbance of monitoring wells/remediaton systems Prohibit disturbance of subsurface soils
OU 2, Site 17	Groundwater VOCs, SVOCs, TPRH, pesticides, inorganics	Groundwater Natural attenuation Long-term monitoring Use restrictions	Prohibit groundwater use for all purposes Prohibit disturbance of monitoring wells/remediation systems
OU 3, Site 8	Groundwater VOCs, SVOCs, inorganics	Groundwater Natural attenuation Long-term monitoring Use restrictions	Prohibit groundwater use for all purposes Prohibit disturbance of monitoring wells/remediation systems
OU 7, Site 16	Groundwater VOCs, bis(2-ethylhexyl) phthalate	Groundwater In-situ air sparging/soil vapor extraction in the source area Downgradient natural attenuation Storm sewer repair Long-term monitoring Use restrictions	Prohibit groundwater use for all purposes Prohibit disturbance of monitoring wells Prohibit disturbance of remediation system Prohibit breaching of storm sewer line
OU 8, Site 3	Groundwater VOCs, SVOCs, Aroclor-1248	Groundwater In-situ air sparging in the source area Downgradient natural attenuation Long-term monitoring Use restrictions	Prohibit residential land use Prohibit groundwater use for all purposes Prohibit disturbance of monitoring wells Prohibit disturbance of remediation system Prohibit disturbance of Rowell Creek sediment Prohibit removal of surface and subsurface soils
OU 9, Sites 36 & 37	Groundwater VOCs, SVOCs, TPRH, inorganics	Groundwater In-situ air sparging in hot spot areas Downgradient natural attenuation Storm sewer/surface water evaluation Long-term monitoring Use restrictions	Prohibit groundwater use for all purposes Prohibit disturbance of monitoring wells Prohibit disturbance of remediation system Prohibit breaching of storm sewer line



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DRAWN BY MJJ	DATE 05Jun03	LAND USE CONTROL AREA OPERABLE UNIT 1, SITES 1 AND 2 EXPLANATION OF SIGNIFICANT DIFFERENCES NAVAL AIR STATION CECIL FIELD JACKSONVILLE, FLORIDA	CONTRACT NUMBER 0039
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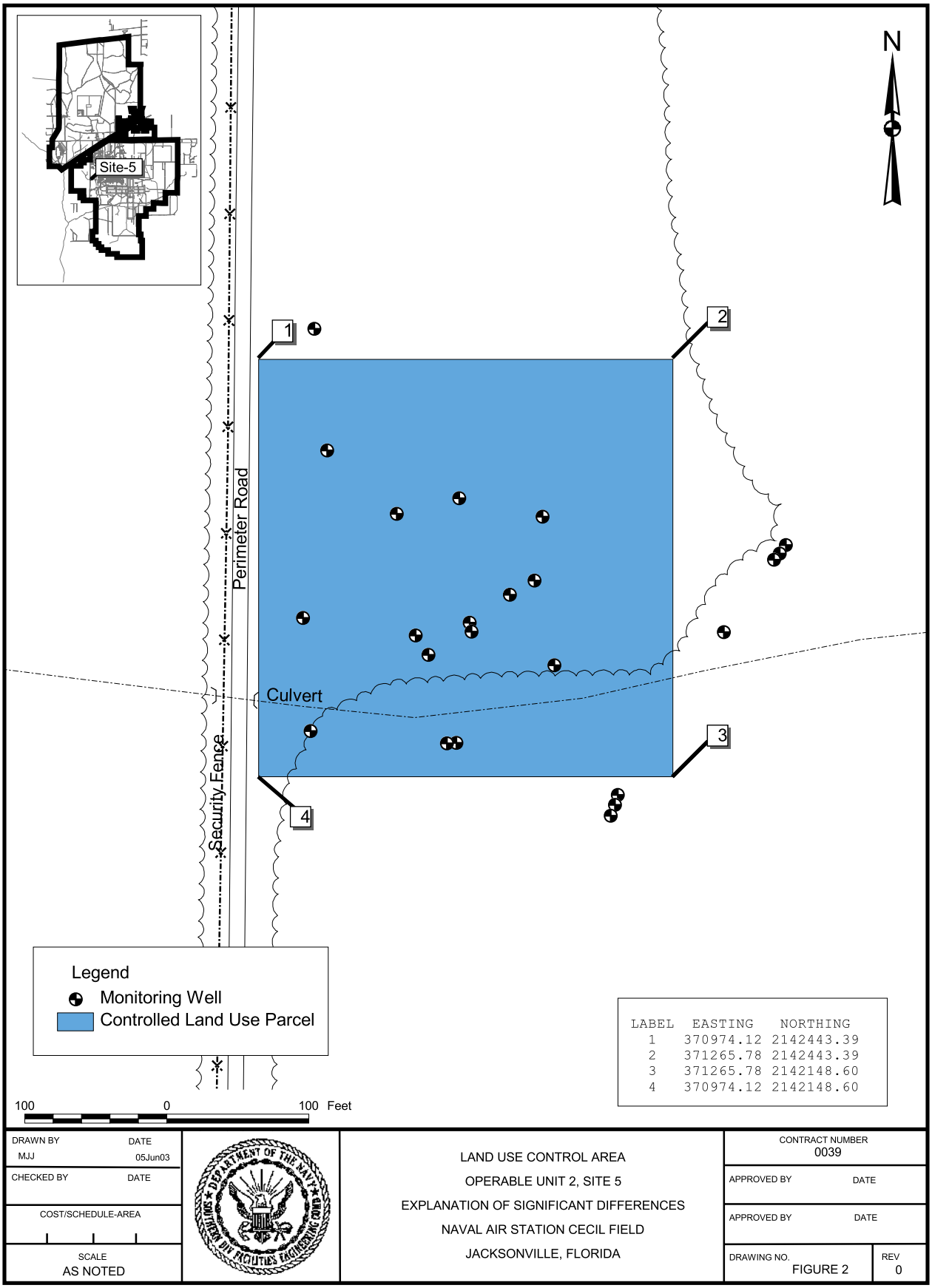
Site-5
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3
4
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Culvert
Legend
Monitoring Well
Controlled Land Use Parcel
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DRAWN BY MJJ
DATE 05Jun03
CHECKED BY
DATE
COST/SCHEDULE-AREA
SCALE AS NOTED
LAND USE CONTROL AREA
OPERABLE UNIT 2, SITE 5
EXPLANATION OF SIGNIFICANT DIFFERENCES
NAVAL AIR STATION CECIL FIELD
JACKSONVILLE, FLORIDA
CONTRACT NUMBER 0039
APPROVED BY
DATE
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REV 0
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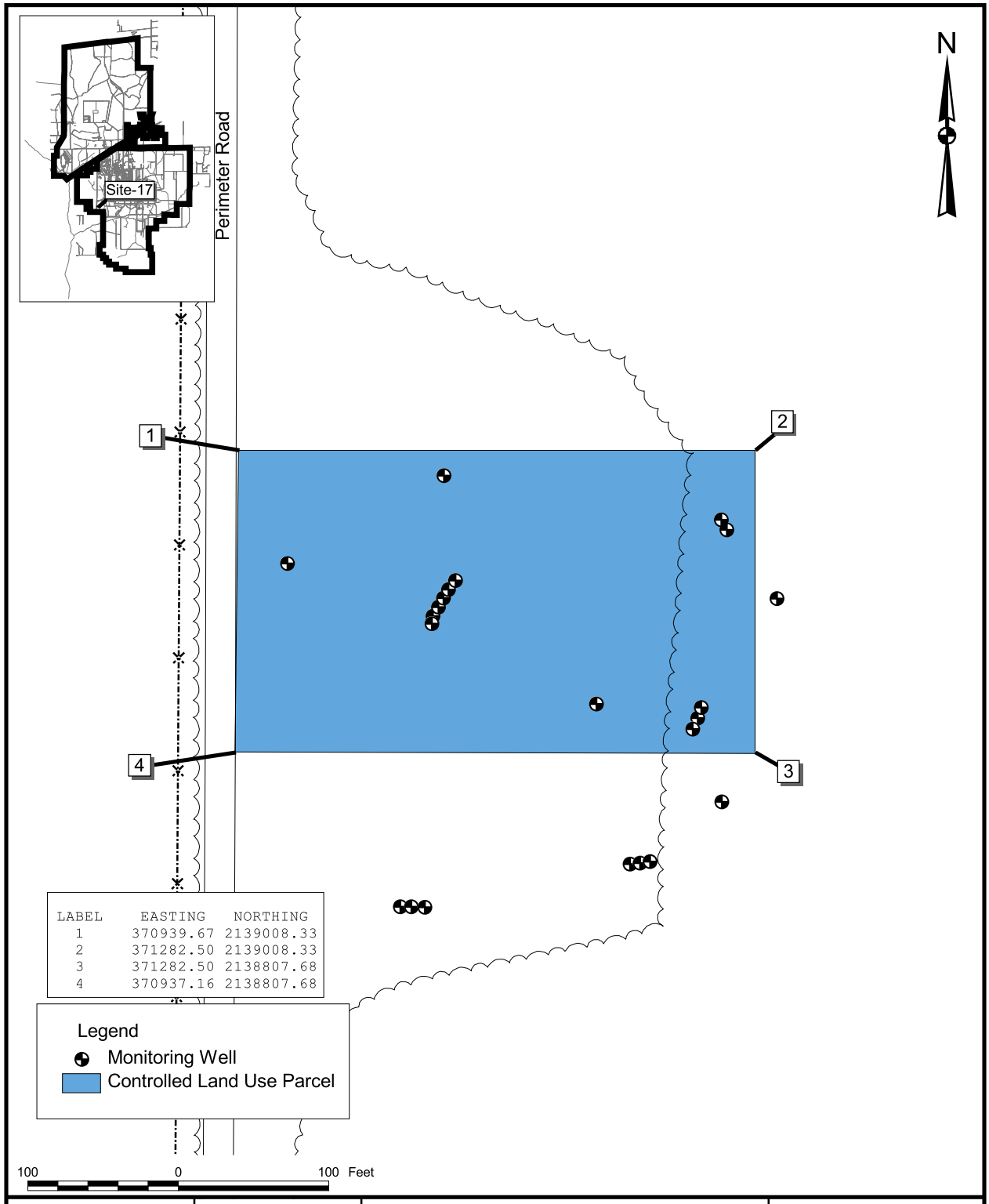

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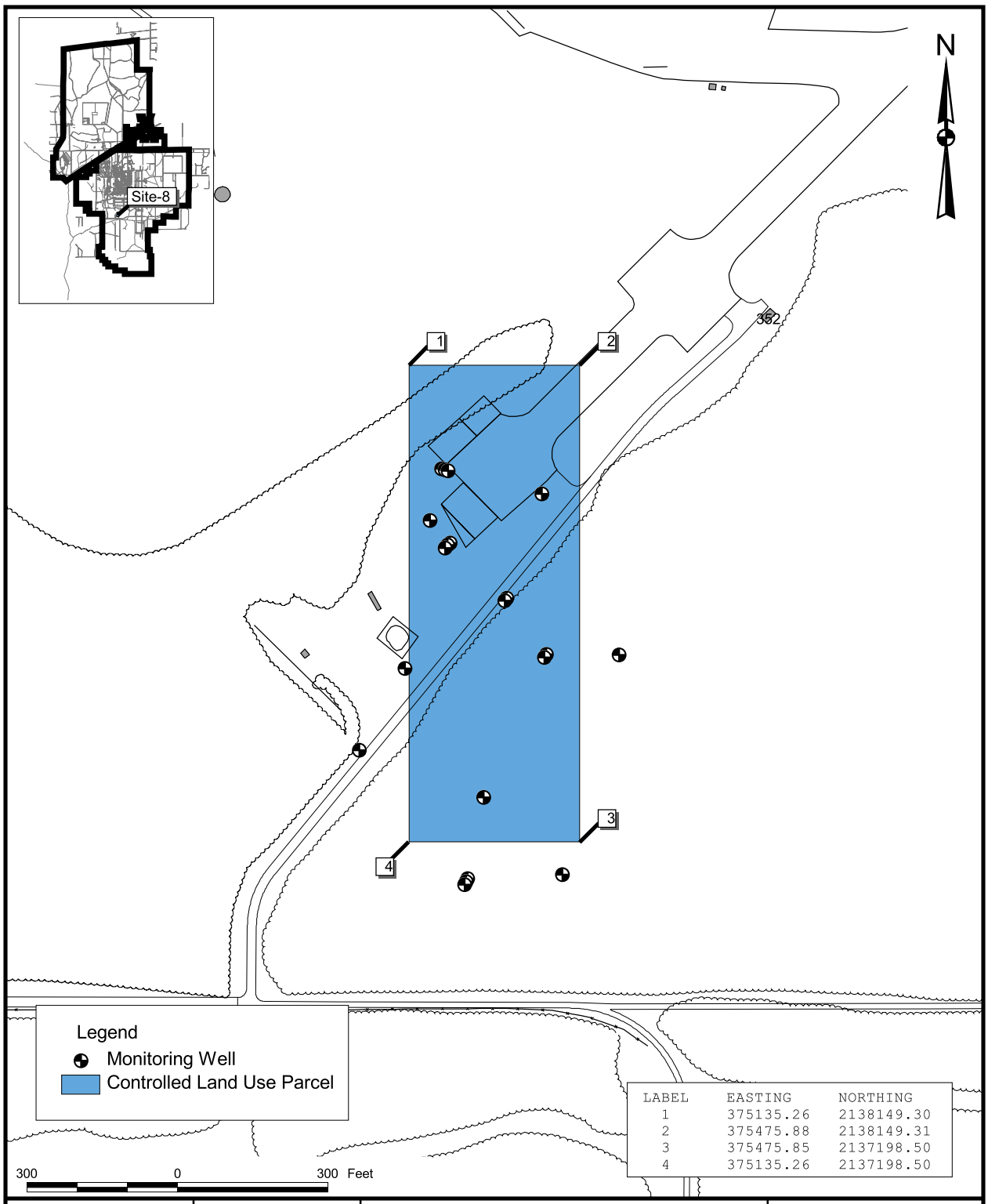

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COST/SCHEDULE-AREA			APPROVED BY — DATE —
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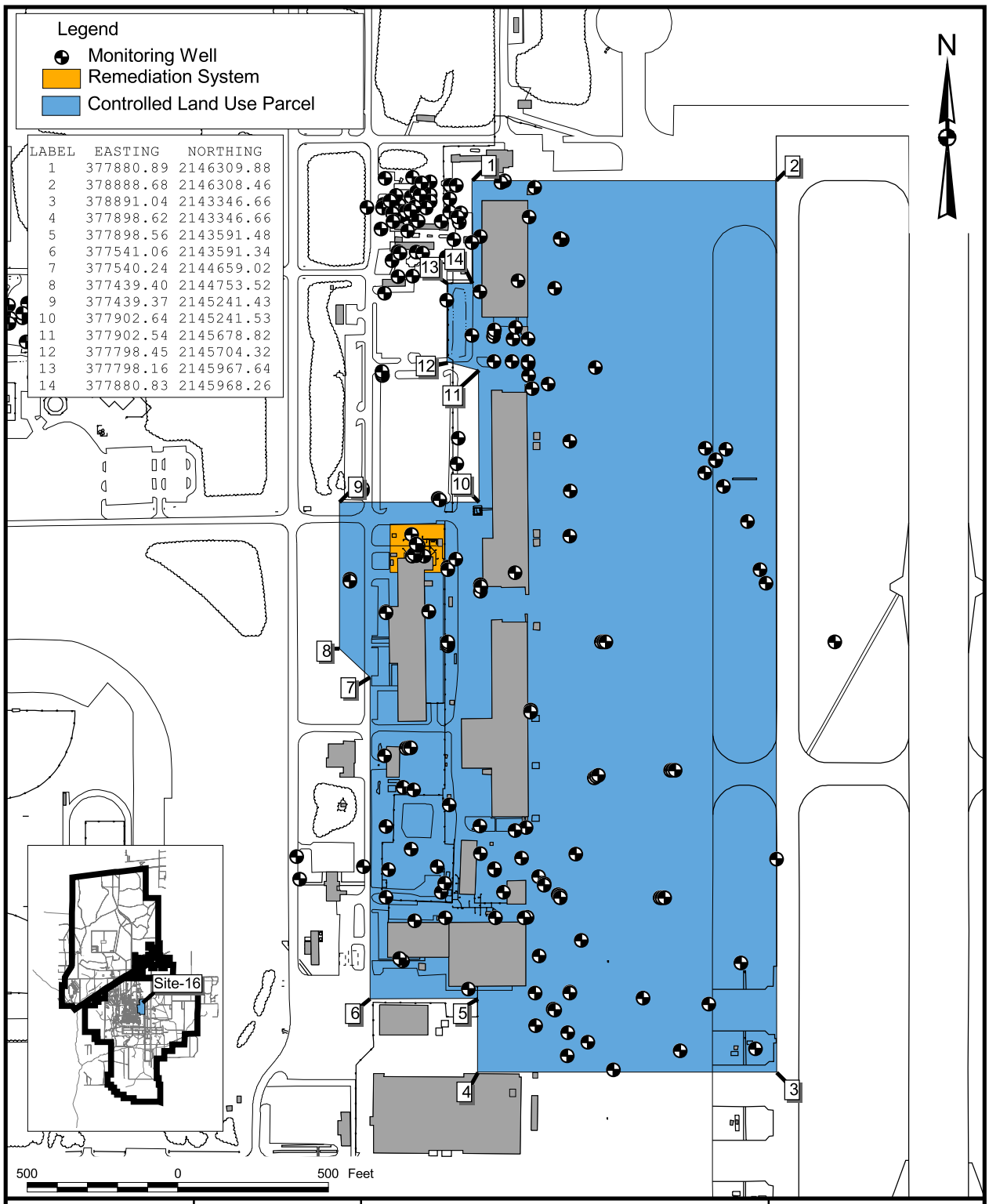

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SCALE AS NOTED			DRAWING NO. FIGURE 5 / REV 0

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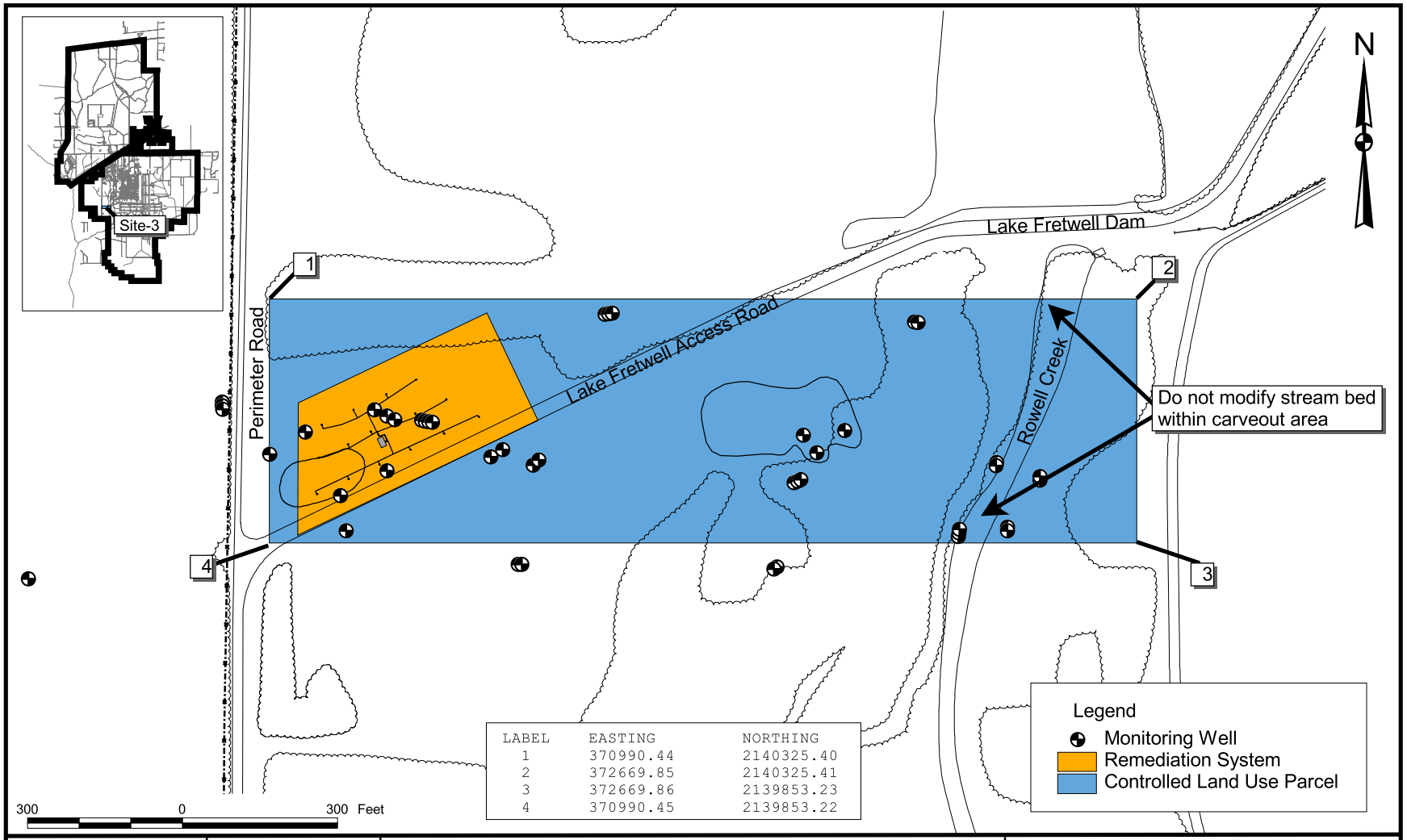

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DRAWN BY MJJ	DATE 05Jun03	LAND USE CONTROL AREA OPERABLE UNIT 8, SITE 3 EXPLANATION OF SIGNIFICANT DIFFERENCES NAVAL AIR STATION CECIL FIELD JACKSONVILLE, FLORIDA	CONTRACT NUMBER 0039
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DRAWN BY MJJ	DATE 05Jun03	LAND USE CONTROL AREA OPERABLE UNIT 9, SITES 36 AND 37 EXPLANATION OF SIGNIFICANT DIFFERENCES NAVAL AIR STATION CECIL FIELD JACKSONVILLE, FLORIDA	CONTRACT NUMBER 0039
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