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NAS CECIL FIELD
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LETTER AND U S NAVY RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION COMMENTS TO SITE MANAGEMENT PLAN 1993 NAS CECIL FIELD FL
12/12/1992
NAVFAC SOUTHERN



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

2155 EAGLE DR., P. O. BOX 10068

CHARLESTON, S. C. 29411-0068

PLEASE ADDRESS REPLY TO THE
COMMANDING OFFICER, NOT TO
THE SIGNER OF THIS LETTER.
REFER TO:

5090
Code 1852

31 DEC 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Eric Nuzie
Florida Department of Environmental Regulation
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RESPONSE TO FDER COMMENTS - 1993 SITE MANAGEMENT PLAN
NAS CECIL FIELD

Dear Mr. Nuzie:

Enclosed are the response to your comments on the 1993 Site Management Plan (SMP) for the Installation Restoration Program at NAS Cecil Field. The SMP was submitted to you on 20 October 1992 and your comments were received by this Command on 23 November 1992.

Please contact Mr. Cliff Casey, Code 1852, at (803) 743-0561, if you have any questions regarding this document.

J. B. Malone
J. B. MALONE, P.E.
Head, Installation Branch
Restoration I Branch

Encl:

(1) Response to 1993 SMP Comments

Copy to:

James Hudson (USEPA, Region IV)

John Dingwall (NAS Cecil Field, Code 18 IR)

Blind copy to:

Barry Lester (ABB-ES)

FILE COPY	
Job #	070-035
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RESPONSE TO FDER COMMENTS AND QUESTIONS
FOR SITE MANAGEMENT PLAN
DATED OCTOBER 20, 1992
NAS CECIL FIELD

1. Comment: Site Management Plan is a stand alone document and should:
 - a. have all of its pages numbered;
 - b. include a map or maps showing the location of all Site Screening PSCs and Remedial Investigation/Feasibility Study PSCs; and
 - c. include a brief description of all site screening PSCs and Remedial Investigation/Feasibility Study PSCs.

Response:

A. Agree

B. *The SMP is a program document designed to establish enforceable milestones. The justification for a specific task duration is defined in the FFA or the site-specific workplans. It is not the intent of this document to discuss the merits of an activity, but rather to define the duration of the activity.*

C. *Same as B.*

2. Comment: GANTT line charts have recently been prepared in conjunction with NAS Jacksonville's Site Management Plan; their use at NAS Cecil Field would be greatly appreciated.

Response: *Gantt line chart(s) were presented in SMPs for Cecil Field in the past, but were discontinued at the request of the reviewing agencies. Gantt charts can be included in future reports if they will be useful.*

3. Comment: The Normal Review Schedule for Operable Units 1, 2, and 7 does not appear to follow an orderly outline form.

Response: *It is not clear from the question what the reviewer is requesting.*

4. Comment: Are any Immediate Remedial Actions planned at Site Screening PSCs or Remedial Investigation/Feasibility Study Sites that present a threat to the general population and/or fauna and flora?

Response: *There are no "time critical actions" identified at NAS Cecil Field. However, the Navy has identified several sites as potential sites for expedited remedial action. For example, a source removal at Site 11 is currently being proposed.*

5. Comment: FDER will try to expedite review times of documents throughout the duration of the Federal Facilities Agreement.

Response: Agree.

6. Specific Comment: Under the Site Management Strategy, paragraph 9, does this mean that specific matrices (i.e. groundwater, soil/sediment) could eventually become separate Operable Units?

Response: Yes, if the Navy Program would be more effective with further Operable Unit separation. However, the Navy would agree to separating a site into more than one operable unit only if the separation was scientifically justified or the process would expedite remedial action at a particular site.

Operable Unit 1

7. What is a POA? Please explain.

Response: The Plan Of Action (POA) defines the contractual actions to be taken by the Navy's Contractor.

8. What is being subcontracted?

Response: The Navy has a primary contractor responsible for overseeing the investigation. Subcontractors are any specialized consultants, such as drillers, analytical laboratories, or soil gas specialist, whose specialized services are needed during the investigation.

9. Why does lab analysis begin at the conclusion of field work and not run concurrently?

Response: In an effort to save time and money, field screening will be performed before beginning conformational sampling. Once the plume has been characterized, permanent monitoring wells will be installed and sampled. The final sampling and analysis will conform to EPA level 4 data quality objectives for risk assessment data. From the time the sample is collected, the sample analysis will require 30 days. This can be performed concurrently with field activities. Also see responses for comments 10 and 15.

10. Why can data validation and lab analysis not be run concurrently?

Response: The data validation will be performed concurrently but offset beyond the laboratory analysis by 30 days (the offset is the duration shown in the schedules). This offset is the time required to perform the analysis and compile the supporting documentation that will be needed during data validation. The confusion is the result of logic used by Timeline™, the computer software program used for scheduling.

11. Ecological Field sampling is scheduled for the winter months under the Risk Assessment. NAS Jacksonville must redo their ecological field sampling that was conducted during the winter and proved inconclusive.

Based upon this previous experience, an alternative period should be considered.

Response: *The ecological sampling will be performed in early spring.*

12. The Draft RI/FS Report is scheduled to begin two months after data validation. Could it begin earlier?

Response: *The bulk of the RI/FS report cannot be written until the analytical data have been validated and the risk assessment has determined the "chemicals of concern."*

Operable Unit 2

13. Can field work activities start simultaneously with OU-1?

Response: *The Navy does not recommend performing multiple investigations for the following reasons.*

1. *The Navy's resources are limited and would be unable to accommodate running concurrent teams.*

2. *Running multiple investigations means that the laboratory would be performing the analyses at the same time, reports would be written concurrently, and agency reviews of documents would be performed at the same time. This is much less effective than performing the investigations sequentially, where the use of the resources are maximized over a longer timeframe, rather than having "lulls" followed by "gluts."*

14. There is a month gap between the end of field work OU-1 and the start of field work at OU-2. Why?

Response: *Thirty days between each investigation is reserved for development of plans of action and subcontracting. The plan of action ensures that information gained during the first investigative activity will be incorporated into the next investigation. Once all parties have agreed to the proposed activities, then the appropriate subcontractors are notified of the start date.*

15. Why does analysis and data management begin after the field work is completed and not run concurrently?

Response: *Laboratory analysis and data management will be performed concurrently, but offset from the field work by 30 or 60 days, respectively. The offset is shown in the schedules as the duration. This offset is the time required after the beginning of drilling before the first sampling is collected. The laboratory will require 30 additional days to complete the analysis. The data validators will require 30 additional days to perform their work, and 30 additional days will be required to manage the data. The confusion is the result of the logic used by Timeline™ software.*