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LETTER AND U S NAVY RESPONSE TO COMMENTS ON INTERIM REMEDIAL ACTION
DOCUMENTS SITES 5 AND 17 NAS CECIL FIELD FL
10/14/1994
ABB ENVIRONMENTAL

October 14, 1994

Mr. Bart Reedy
Remedial Project Manager
Federal Facilities Section
Waste Management Division
USEPA Region IV
345 Courtland St. NE
Atlanta, GA 30365

**Subject: Response to Comments on Interim Remedial Action Documents, Sites 5 and 17,
Naval Air Station Cecil Field, Jacksonville, Florida**

Dear Mr. Reedy:

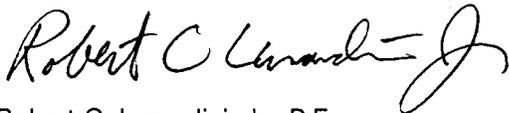
On behalf of Southern Division Naval Facilities Engineering Command (SOUTHDIV), ABB Environmental Services, Inc. is pleased to forward two copies of the Response to Comments on the Sites 5 and 17 Interim Remedial Action documents (e.g. the IRODs, Proposed Plans, and Focused Feasibility Studies).

The responses are presented in table format and include responses to comments received from USEPA and FDEP. Due to schedule restraints and the date of receipt of comments all documents were finalized prior to this submission however, comments were incorporated into the final IRODs.

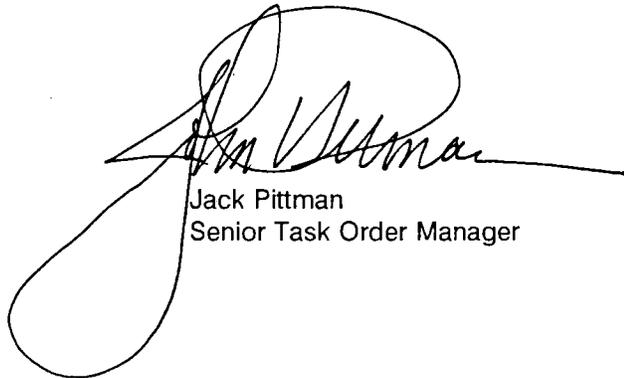
Questions or comments should be directed to Mr. Alan Shoultz at (803) 743-0669.

Sincerely,

ABB ENVIRONMENTAL SERVICES, INC.



Robert C. Lunardini, Jr., P.E.
Senior Engineer



Jack Pittman
Senior Task Order Manager

attachments

cc: Mr. Alan Shoultz, SOUTHDIV (3 copies)
Mr. Eric Nuzie, FDEP (2 copies)
file

ABB Environmental Services, Inc.

Response to Comments
Final Draft Interim Record of Decision, Sites 5 and 7
Focused Feasibility Study Site 5
Proposed Plan Sites 5 and 17

NAS Cecil Field, Jacksonville Florida

Florida Department of Environmental Protection
Michael J. Deliz

Comment Number	Comment	Response
Final Draft Interim Record of Decision		
Site 5, Oil and Sludge Disposal Area Northwest		
1	Page 1-2, it is stated that the preferred alternative will take 16 months to complete while the Proposed Plan states that it will take 14 months to complete. Which is correct?	The IROD was changed to indicate a remediation time of 14 months.
2	Page 2-1, Section 2.2, with the disposal pit being visible on a 1969 aerial photograph it is highly unlikely that the disposal of waste oils and fuels was limited to the 1950's.	Agree.
3	Page 2-3, Figure 2-2, the boundaries of the aerial extent of the calculated 16,300 cubic yards of TPH contaminated should be included on this figure.	The 50 ppm TRPH contour line was added to the figure.
4	Page 2-3, Figure 2-2, will the wetlands delineated on this figure be effected by the proposed exaction of soils?	No. Precautions will be taken during the implementation of this action to minimize any impacts to the wetlands.
5	Page 2-9, 4th paragraph, the 1 mg/kg cleanup level for PCBs is a Florida health-based action level and not a regulation.	Text changed as suggested.
6	Page 2-11, Section 2.9.3, how effective is bioremediation on PCB contaminated soils?	The proposed biological treatment is not intended to degrade PCBs. PCB concentrations in the soil are within Florida health-based levels. Text was added to Section 2.7 to clarify the PCB issues associated with Site 5.
7	Page 2-11, last sentence, the estimated time for RA-2 is stated as 14 months, while on Page 2-1 it is stated as taking 16 months. Which is correct?	See response to comment No. 1.
8	Page 2-13, Table 2-3, it is stated that under Alternative RA-2 that biological treatment is not expected to be reliable for PCBs and that PCBs are not treated. Is our solution for eliminating PCB contamination in soils diluting the PCB contaminated soils during land farming?	See response to comment No. 6.
9	Page 2-14, Table 2-3, it is stated that the time of remediation will take approximately 16 months. See comments 1 and 7.	See response to comment No. 1.
10	The IROD may want to caveat the preferred alternative regarding the PCB contamination. If PCB contamination is not diminished after approximately 14 months of land farming an alternative for eliminating the threat of PCB contamination should be proposed.	See response to comment No. 6.

**Response to Comments--continued
Final Draft Interim Record of Decision, Sites 5 and 7
Focused Feasibility Study Site 5
Proposed Plan Sites 5 and 17**

NAS Cecil Field, Jacksonville Florida

Florida Department of Environmental Protection
Michael J. Deliz

Comment Number	Comment	Response
Proposed Plan for Interim Remedial Action Site 5, Oil and Sludge Disposal Area Northwest		
1	<p>Page 9, Section 5.0, Long-Term Effectiveness and Permanence, it is stated that Alternative RA-2 is reliable. How reliable will this alternative be in the reduction of PCB contamination?</p> <p>The remainder of the document is consistent with the FDEP approved Focused Feasibility Study</p>	<p>The proposed biological treatment is not intended to degrade PCBs. PCB concentrations in the soil are within Florida health-based levels. Text was added to Section 2.7 of the IROD to clarify the PCB issues associated with Site 5.</p>
Final Draft Interim Record of Decision Site 17, Oil and Sludge Disposal Area Southwest		
1	<p>Page 1-1, Section 1.4, the Proposed Plan states that based on cost the preferred Alternative will be either RA-1 or RA-2, yet the Draft IROD states that the preferred alternative is RA-1. This should be corrected in the Draft IROD or the Proposed Plan.</p>	<p>The decision to use onsite thermal treatment (RA-2) was made after the Proposed Plan was finalized. The decision was based on Bechtel cost estimates and agreed to by all FFA parties. The Proposed Plan indicated that either onsite or offsite treatment would be used. The IROD indicated that onsite treatment would be used. Both documents are consistent and correct as written. The fact that offsite treatment was not selected does not require that the Proposed Plan be modified. The public did not indicate a preference for either alternative.</p>
2	<p>Page 2-3, Figure 2-2, the boundaries of the aerial extent of the calculated 9,900 cubic yards of TPH contaminated should be included on this figure.</p>	<p>The 50 ppm TRPH contour line was added to the figure.</p>
3	<p>Page 2-7, Section 2.6, it is stated that the surficial aquifer extends from the water table to the 32 foot clay layer overlying the dolomite, while in the IROD for Site 5 the surficial aquifer is described as extending from the water table to the top of the dolomite. Which is correct?</p>	<p>The description in the Site 17 IROD is correct. The Site 5 IROD was modified to indicate the surficial aquifer extends from the water table to the top of the clay layer, approximately 56 feet bls.</p>
Proposed Plan for Interim Remedial Action Oil and Sludge Disposal Area Southwest, Site 17		
	<p>This document is consistent with the FDEP approved Focused Feasibility Study and I have no comments.</p>	
Focused Feasibility Study, Site 17, OU 2		
May 16, 1994 Letter from John Mitchell to Alan Shoultz		
	<p>Our only comment related to this document concerns the location of the wetland mentioned in Section 2.1.2 (Location Specific ARARs) on page 2-3. The boundaries of this wetland should be shown on the site related figures for us to adequately determine that no adverse impacts would occur, whichever remedial alternative is chosen at Site 17. The type of wetland should also be defined.</p>	<p>A figure showing the wetland limits and the remediation limits is presented in the Site 17 IROD. Remedial activities at Site 17 are not expected to impact the palustrine forested broad-leaved deciduous wetlands.</p>

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NAS Cecil Field, Jacksonville Florida

U.S. Environmental Protection Agency Region IV
 Bart Reedy

Comment Number	Comment	Response
September 16, 1994 Letter from Bart Reedy to Steve Wilson		
General Comments on the two IRODs		
	<p>For both sites, these actions are interim actions and need to be followed by a full Remedial Investigation/Feasibility Study (RI/FS) including a Baseline Risk Assessment (BRA). The data for the RI/FS and BRA should be obtained following the removal actions set forth in these IRODs. The BRA must reflect current site conditions, in this situation, post Interim Actions. However, data needed for the final BRA can be obtained during these actions, (eg. sampling the side walls and floor of the excavations prior to fill placement).</p> <p>It is requested that the statement of basis and purpose sections of both documents be reviewed. The purpose of the actions needs to be clearly stated and any further mention of the purpose in the document needs to be equally clear and concise. All statements concerning purpose, basis actions and goals must be consistent and concise.</p>	<p>Confirmatory sampling results obtained at both sites will be available for inclusion in the final BRA. The final BRA will include an additional section on postremediation results. The draft BRA will be submitted prior to the completion of confirmatory sampling.</p> <p>The statement of basis section in both IRODs has been revised to clearly state the purpose of the actions. All subsequent text concerning the purpose, basis actions, and goals has been modified to be consistent throughout the document.</p>
Site 5, Oil Disposal Area Northwest		
	<p>EPA concurs with the need for an interim removal action to meet the Remedial Action Objectives of removing the source of contamination to ground water and reducing human health risks from direct contact exposure to the soil. There is LNAPL present at the site floating on the water that is a continuing source of soil and groundwater contamination.</p> <p>As transmitted earlier, additional explanation of the PCB reduction rational and the monitoring of that reduction is needed in the IROD.</p> <p>Please remain aware for future site investigations that lead is present in ground water up to 49 mg/L. This is above the action level of 15 mg/L.</p>	<p>Section 2.7 has been revised to include a detailed explanation of the PCB issues at Site 5.</p> <p>Noted. Lead in groundwater above the action level of 15 µg/L will be addressed in the BRA and FS.</p>

**Response to Comments--continued
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Focused Feasibility Study Site 5
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NAS Cecil Field, Jacksonville Florida

U.S. Environmental Protection Agency Region IV
Bart Reedy

Comment Number	Comment	Response
Site 17, Oil and Sludge Disposal Area Southwest		
	<p>EPA is concerned that the rationale presented for this action is weak. TRPH is present in the soil but may not be sufficiently mobile to serve as a source of imminent risk to the ground water. The presence of these soil contaminants in the ground water needs to be presented. In addition, the chemicals present have not been identified and hence, the human health risks from direct contact exposure to soil remain unknown. Apparently, the only chemical in ground water above MCLs was TCE despite the suspected disposal history of fuels and oils as well as solvents. It is highly recommended that the rationale and objective sections include verbiage that highlights the aspect of site stabilization and prevention of additional site degradation.</p> <p>On page 1-1, 3rd paragraph, the "purpose" statement is incorrect as written. What is written is a brief statement of the action proposed. The purpose is to remediate as outlined in the above comment.</p>	<p>The statement of basis and purpose section has been modified to state that the purpose of this action is site stabilization and prevention of additional site degradation.</p>
Site 11, Golf Course Pesticide Disposal Area		
	<p>Regarding Site 11, EPA concurs with the need for an interim removal action as outlined in the IROD that was recently approved. When test pits were dug for initial sampling, air concentrations of 1,2-dibromo-3-chloropropane (DBCP) was detected above an OSHA Permissible Exposure Limit (PEL) of 1 ppb. Site workers wore level B personal protective equipment and breathed supplied air; hence, the immediate need for some remedial action.</p> <p>The critical toxic effect of DBCP is testicular atrophy and impaired spermatogenesis and the Reference Concentration (RfC) is 2E-04 mg/m³ - an extremely low value, consistent with the very high toxicity of this chemical.</p> <p>Immediately following the removal action when the earthmoving equipment is still in place, it will be critical to resample the air with the appropriate equipment to ensure that all of this noxious pesticide has been removed to appropriate levels. Indeed, air monitoring at every stage of the removal action should be thorough and explicitly stated in the work plan. EPA's Office of Health Assessment would like to review the work plans for this removal when it becomes available.</p>	<p>The Navy is currently negotiating the execution of this work with an 8A contractor (Omega Environmental, Tucker, Georgia). Field work is expected to begin in November 1994. The Navy will forward a copy of Omega's Workplan to USEPA's Office of Health Assessment as soon as it becomes available.</p>

Response to Comments--continued
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U.S. Environmental Protection Agency Region IV
 Bart Reedy

Comment Number	Comment	Response
September 13, 1994 Letter from Bart Reedy to Steve Wilson		
1	Please elaborate on the use of the Region III Risk Based Concentration tables. Which tables were used and when? A logic tree or flow chart carrying a couple of contaminants through the process is requested. A scaled back discussion should be presented in the appropriate documents. Additionally, please elaborate on the logic employed relative to cumulative risks and carcinogens and non-carcinogens.	The Region III Risk Based Concentration (RBC) tables were used in the Site 5 and Site 17 Focused Feasibility Studies as one option for determining soil cleanup levels. This option was not selected for either site since the FDEP TRPH criterion for clean soils always encompassed a larger area or volume than detected concentrations of specific contaminants listed on the RBC table. The First Quarter 1994 RBC table used was based on the lower of a lifetime cancer risk of 1 in a million or a hazard quotient of 1.0 for each contaminant. No site specific risk assessment was performed for these interim actions.
2	The proposed plans for both sites state that the final Remedial Investigations and Feasibility Studies will be completed by the end of 1994. These statements are in section 3.0 of both documents.	Text in the final IRODs has been modified to state the RI/FS reports for OU 2 will be completed in the first quarter of calendar year 1995.
3	Please elaborate on if and how sampling and analytical work required for the final Remedial Investigation, Feasibility Study and Baseline Risk Assessments will be secured during these interim actions.	Design documents will be prepared by the Navy to implement each of these interim actions. A complete sampling and analytical program will be included in the design documents.
4	The soil action levels proposed are based on human health concerns and an evaluation of the ecological risks was not presented. Therefore, the possibility exists that action levels protective of a concern identified during the BRA might not be reached during the cleanup under these two actions.	Agree. Upon completion of the final baseline risk assessment a final decision can be made as to whether additional soil remediation is required. However, based on the information currently available to the Navy (i.e., draft BRA) it appears that additional soil remediation will not be needed unless contamination is released during the interim remedial action.
5	It appears that the soil actions levels were based solely on human health considerations and did not include evaluations of any ecological risks. Please elaborate on how the upcoming Baseline risk assessments will address Ecological risks. The BRAs must reflect the conditions at the sites following the completion of these actions.	The draft BRA will evaluate site conditions as they currently exist. Post-interim-action confirmatory sampling results obtained at both sites will be available for inclusion in the final BRA. The final BRA will include an additional section on postremediation results.
6	Please explain how the limits of soil excavation will be delineated. Will sampling be conducted in the actual excavations prior to backfilling?	See response to comment No. 3.

Response to Comments--continued
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Comment Number	Comment	Response
7	At site, 5, the explanation of the proposed treatment of the PCB contamination is not be adequate to insure that the public health has been protected. Please elaborate on the nature of the risk and the associated treatment alternatives proposed. The PCB discussions could be read to state that maybe something less than full protection of public health was being proposed. (a portion of the answer is alluded to at page 2-20 of the FFS). This issue needs to be addressed in all of the decision documents for this site.	The proposed biological treatment is not intended to degrade PCBs. PCB concentrations in the soil are within Florida health-based levels. Text was added to Section 2.7 of the IROD to clarify the PCB issues associated with Site 5.
8	At site 5, will the proposed biological treatment use native microbes or will non-native microbes be added?	Initial treatability test results indicate that native microbes will biologically treat the soils.
9	At site 5, please elaborate on how the effectiveness of the biological degradation will be monitored. How will the rate of reduction be reported? At what point will the decision be made concerning the degradation of PCBs.	Design documents will be prepared by the Navy to implement the Site 5 interim action. A complete sampling and analytical program will be included in the design documents. Biological treatment is not intended to degrade PCBs. Any future decisions concerning PCBs will only be made if analyses indicates PCBs are present above health-based levels. Final risk assessments will be made for all contaminants present at the site based on currently available and post-interim-remedial action sampling and analyses.