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NAS CECIL FIELD
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LETTER AND U S EPA REGION IV COMMENTS TO INTERIM RECORD OF DECISION SITES
5 AND 17 NAS CECIL FIELD FL
9/16/1994
U S EPA REGION IV



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

SEP 16 1994

4WD-FFB

Commander
Attention Mr. Steve Wilson
Department of the Navy
Southern Division
NAVFAC
Code 1889
2155 Eagle Drive
North Charleston, South Carolina 29411-0068

RE: Interim Record of Decision
Sites 5 & 17

Dear Mr. Wilson:

Following are the comments on the above referenced site documents. These comments need to be addressed in the final versions of the Interim Records of Decision and the supporting decision documents. A separate submittal should be included with the revised documents. This submittal should reference these comments and the resolution of the issues raised.

General Comments on the two IRODS

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).

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.

Site 5, Oil Disposal Area Northwest

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.

As transmitted earlier, additional explanation of the PCB reduction rationale and the monitoring of that reduction is needed in the IROD.

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.

Site 17, Oil and Sludge Disposal Area Southwest

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.

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.

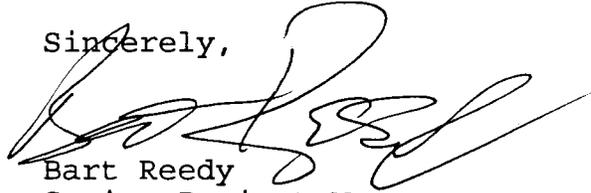
Regarding Site 11, EPA concurs with the need for an interim removal action as outlined in the IROD that was recently approved. When test pits were dug for initial sampling, air concentrations of 1,2-dibromo-3-chloropropane (DBCP) was detected above an OSHA Permissible Exposure Limit (PEL) of 1 ppb. Site workers wore level B personal protective equipment and breathed supplied air; hence, the immediate need for some remedial action.

The critical toxic effect of DBCP is testicular atrophy and impaired spermatogenesis and the Reference Concentration (IRIS) is $2E-04$ mg/m³ - an extremely low value, consistent with the very high toxicity of this chemical.

Immediately following the removal action when the earth-moving 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.

As we agreed to previously, these comments will be faxed directly to your office and the navy contractor to expedite the correction of the documents. Hard copies of course will follow via the mail. Should you have any questions, please contact me at the letterhead address or at (404) 347 3555 vmx 2049.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bart Reedy', written in a cursive style.

Bart Reedy
Senior Project Manager

cc: M. Deliz FDEP
R. Angara ABB