

N60200.AR.008912
NAS CECIL FIELD
5090.3a

LETTER AND U S EPA REGION IV COMMENTS ON FEASIBILITY STUDY OPERABLE UNIT
2 (OU2) NAS CECIL FIELD FL
3/29/1995
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

4.2.3-
002

03-29-95

Mr. Steve Wilson
Department of the Navy
Southern Division
NAVFAC
Code 1889
2155 Eagle Drive
North Charleston, S.C. 29411-0068

RE: Operable Unit 2
Feasibility Study

General Comments:

- 1) **Recalculation of RGOs.** Table 5-5, the Summary of the Target Cleanup Levels for groundwater is incomplete. EPA comments on the BRA indicated that lead should be included as a COC. In addition, the EPA had reservations about the calculation of inhalation exposure to VOCs during showering. Finally, RGOs in the risk assessment were calculated for each chemical rather than for each use scenario.

The reviewer anticipates that the RGOs will be recalculated when risk assessment is rewritten. These new RGOs should be used to formulate the Remedial Action Objectives.

- 2) **Discussion of Timing.** The reviewer feels that the FS and subsequent documents need an explicit statement of the time period for which the risk assessment and its various aspects are applicable. Because of the IRAs, the soil risks will be reduced, presumably to levels considered protective, before the completion of the groundwater and sediment remediation. For this reason, surface soil is not considered in the BRA or the FS. Both the risk assessment and the FS are applicable to the time when the IRAs are completed. A statement of this is needed. Probably the clearest way to present the expected timecourse of site remediation and the pertinence of the BRA is with a timeline chart.

Specific Comments:

1. The discussion under the Compliance with ARARs portion of Section 7.6.2 on page 7-27 states that the remedial action objectives may be met before all target cleanup levels have been

reached; therefore chemical-specific ARARs may not be attained. This language is confusing, or erroneous, because chemical-specific ARARs are either based on concerns about human health, or, if not solely based on human health concerns, should be attained before an exclusively human-health based concentration would be attained.

2. In Section 7.7.1 Location of Treatment System on page 7-33, the text states that combined treatment of water from both OU2 sites would not affect the discharge criteria. The discussion of discharge criteria in the previous paragraph presents an estimated area for an infiltration basin which is apparently based on the volume of water which would be extracted at each site. If treatment of water from both sites is combined, it would be reasonable that discharge of water from both sites would be combined, and thus the dimensions of the infiltration basin would change. The discussion of discharge in the preceding paragraph should be revised to define the approximate discharge specifications if treatment from both sites is combined.

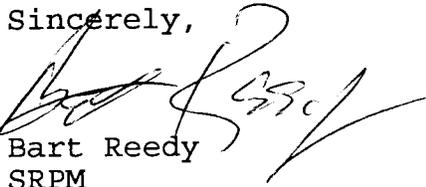
3. Section 7 does not present a detailed analysis of the selected ground water discharge alternative. Other potential discharge alternatives were screened out in Section 6 because of concerns about their implementability. However, the feasibility of utilizing an infiltration basin discharge option in the hydrogeologic setting of the site has not been evaluated in the FS Report. There should be some assurance in the FS Report that the infiltration basin discharge option is implementable, and the basis for the approximate sizing of such an infiltration basin, or basins, should be presented.

4. In Table 8.2, page 8-8, for Alternative GW-2, the discussion of reliability of controls states that no controls are implemented, whereas the discussion of adequacy of controls indicates that there would be controls on the use of ground water for this alternative.

Additional comments from the ECO review may be forthcoming. They will be forwarded as soon as reviewed.

Should you have any questions, please contact me as soon as possible.

Sincerely,



Bart Reedy
SRPM

cc: M. Deliz, FDEP
R. Angara, ABB