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NAS CECIL FIELD
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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT GENERAL INFORMATION REPORT AUGUST 1996 NAS CECIL FIELD FL
12/9/1996
U S EPA REGION IV

Rec'd

Rec'd 12/18/96

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

Bill O'steen's comments
Still need ECO.

December 9, 1996

4WD-FFB

Commanding Officer
Attn: Steve Wilson, P.E.
Department of the Navy
Southern Division
Naval Facilities Engineering Command
P.O.Box 190010
2155 Eagle Drive
North Charleston, South Carolina 20419-9010

SUBJ: Naval Air Station Cecil Field
Draft General Information Report dated August 1996

Dear Mr. Wilson:

The U.S. Environmental Protection Agency has reviewed the subject document. My major concern with the draft GIR is that it does not fulfill my understanding of the purpose of the report and is lacking many materials that I thought would have been included. Attached are detailed comments regarding this point and others.

If you have any comments please contact me at 404/562-8539.

Sincerely,

Deborah A. Vaughn-Wright

Deborah A. Vaughn-Wright
Remedial Project Manager

cc: NAS Cecil Field BCT (E-mail)

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General Information Report Review Comments
December 8, 1996

Section 1 *Introduction*

1. page 1-1: The Introduction gives the purpose of the document is to present general background site information that routinely is repeated within every remedial investigation (RI) or feasibility study (FS). Based on my understanding of the purpose of the GIR, this general explanation does not relay the complete purpose for a general information report.

My understanding of the purpose for the General Information Report was multifold and it was to include:

1. A general discussion of sites at NAS Cecil Field undergoing a RI/FS;
2. Serve as a single source of standard operating procedures that have been approved by the Base Closure Team;
3. Serve as a reference for current and future Navy BRAC/Clean contractors; and
4. Serve as a reference for future reports

If this is not the case, we need to further outline what everyone expects to be in the document, and the ultimate purpose of the document so that the team can decide what exactly should be included. Also, I was wondering if we wanted to limit the GIR to only CERCLA sites or to include IRP sites and Petroleum sites as well. If the GIR is to include methodologies to be used for all investigations it may be appropriate to specify that the same methodologies would be used for any investigation at NAS CF.

Section 2.0 *Remedial Review and Status*

1. Section 2.0, page 2-1, 2nd paragraph: The Office of Management and Budget does not place sites on the NPL. They are only part of the EPA's concurrence process. Please delete from the 1st sentence.

2. Section 2.0, page 2-1, 3rd paragraph: The discussion of sites under investigation should be expanded/clarified. The paragraph is misleading and does not fully explain which sites are under investigation and for what program.

Suggested wording - " Sites 1, 2, 3, 5, 7, 8, 10, 11, 14, 15, 16 and 17 have been designated as operable units (Table 2-1). These sites were segregated according to their similarities in disposal methods, waste types and initial phases of remedial action. Sites 4, 6, 12, 18 and 19 are still categorized as PSCs and will also undergo remedial investigations. They were not segregated into operable units because ..... Site 13 was transferred to the underground storage tank program."

Tabe 2-1 as suggested is below.

TABLE 2-1

OPERABLE UNIT	SITE NUMBER	SITE NAME
1	1 2	Old Landfill New Landfill
2	5 17	Oil Disposal Area, NW Oil/Sludge Disposal Pit, SW
3	7 8	Old Fire Fighting Training Area Boresite Range Hazardous Waste Storage/Fire Fighting Training Area
4	10	Rubble Disposal Area
5	14 15	Blue 5 Ordnance Disposal Area Blue 10 Ordnance Disposal Area
6	11	Golf Course Pesticide Disposal Area
7	16	AIMD Seepage Pit
8	3	Oil/Sludge Disposal Pit

Section 3.0 No Comments

Section 4.0 *Previous Investigations*

1. Section 4.0: Add a table similar to Table 1-1 found in the RI for OU-1, but include all past investigations.

Section 5.0, No Comments

Section 6.0 No Comments

Section 7.0 No Comments

Section 8.0 No Comments

Section 9.0 *PSC 4, Grease Pits*

1. Section 9.3, page 9-3: Explain why site 4 was removed from OU-2.

2. In the 3rd sentence, 1st paragraph, recommend rather than referring to future investigations, state that a separate investigation will be conducted. Since this document will be a 'living reference', the reference to 'future' investigation may quickly become obsolete.

Section 10.0 No Comments

Section 11.0 No Comments

Section 12.0 No Comments

Section 13.0 No Comments

Section 14.0 No Comments

Section 15.0 No Comments

Section 16.0 No Comments

Section 17.0 No Comments

Section 18.0 No Comments

Section 19.0 No Comments

Section 20.0 No Comments

Section 21.0 No Comments

Section 22.0 No Comments

Section 23.0 No Comments

Section 24.0 No Comments

Section 25.0 *Human Health Risk Assessment*

1. Section 25.2, page 25-2, paragraph 0, bullet 1, sentence 1: The sentence states that sample Quantitation Limits are below risk-based concentration limits and Florida Cleanup Goals. However, some of these criteria (such as for PAHs) are not achievable by most methods. This statement should be clarified accordingly.

2. Section 25.2, page 25-2, paragraph 1, sentence 1: This sentence states that analytical data will be evaluated to determine if tentatively identified compounds (TICs) need further consideration in the risk assessment. However, for example, TICs were not mentioned in the risk assessment for OU-3. The TICs may have been evaluated in the OU-3 Data Report, but it was not so stated in the Risk Assessment itself. This omission for the TICs should be addressed in the OU-3 Risk Assessment and addressed in future Risk Assessment reports.

3. Section 25.3, page 25-3, paragraph 4: This paragraph states that frequency of detection will be used as a criterion for HHCPC (COPC) selection. However, according to Region 4 guidance, the frequency of detection should not be COPC selection criteria. Thus, this paragraph should be deleted and the COPCs should be reselected accordingly.

4. Section 25.3, page 25-4, paragraph 2: This paragraph discusses criteria for subsurface soils. However, the text does not include soil to leaching groundwater RBC listed in Appendix B. In addition, the Florida Leaching value was used for only those organic compounds detected in the groundwater which may be misleading. The soil to leaching RBCs and/or appropriate Florida criteria should be used for all detected contaminants in the subsurface soils. This discrepancy should be resolved accordingly.

5. Section 25.4.3, page 25-9, paragraph 3, sentence 1: This sentence states that the CT EPC is the average detected concentration. However, the average of only the detected concentrations does not have a valid statistical basis and should not be used. A more appropriate CT estimator is the mean value calculated by using the appropriate distribution calculations used for calculation of UCL. For example, if a lognormal distribution formula is used to calculate the UCL then an appropriate CT estimator according to Gilbert (1987) is:

$$CT=e^{(X=0.5*S\ E2)}$$

where:

CT = Central Tendency Estimator

e = base of natural log

X = Arithmetic mean of the natural log transformed data
S = Standard deviation of the natural long transformed data

If a lognormal distribution is assumed, then all estimator should be based on lognormal distribution.

6. Section 25.4.3, page 25-10, paragraph 0, sentence 0: States that the central tendency exposure assessment will be discussed in the Uncertainty section of the risk assessment. During the review of the OU-3 risk assessment it was not done. This discrepancy should be resolved for the OU-3 and future risk assessments.

7. Section 25.4.4, page 25-11, paragraph 2: This paragraph describes the calculation method for estimating contaminant concentrations in bathroom air so that intake contaminants from showering can be estimated. However, the preferred method by Region 4 Supplemental Guidance (EPA,1995) is to assume the inhalation intake contaminants while showering is equal to the oral intake of 2 liters of water. This discrepancy should be resolved accordingly.

8. Section 25.5, page 25-12, paragraph 2, sentence 3: This sentence states that each risk assessment will contain a toxicity profile for each HHPC identified at that SWMU. However, it was noted that the toxicity profile is not included in the OU-3 risk assessment. Instead, as previously noted, the toxicity profile is in the Data Document. This discrepancy should be resolved for the OU-3 and future risk assessments.

This comment also applies to paragraph 2 and page 25-13.

9. Section 25.6.1: This section discusses the general uncertainty analysis. However, during the during the review of the OU-3 risk assessment, it was noted that the text does not discuss the uncertainties of the specific risk results and relate the impact of the uncertainties to the risk results. In particular, Table 25-5 was not included in the OU-3 risk assessment. This discrepancy should be addressed in the OU-3 and future risk assessments.

Section 26.0 No Comments

Appendix B

1. Tables B-3-1 and B-3-2, pages B3-2 and B3-4: The source for the age weighted surface area is listed as Appendix B-7. However, there is no Appendix B-7. The reference should be corrected accordingly.

2. Appendix B-3, Tables B-#-2 and B-3-3, pages B3-8 and B3-10: The source for the concentrations in air is listed as Appendix D-5. However, the correct reference appears to be Appendix B-4. The discrepancy should be corrected.

3. Appendix B-3, Table B-3-6, page B3-11: the source for the age weighted surface area is listed as Appendix D-7. However, there is no Appendix D-7. This discrepancy should be

corrected.

4. Appendix B-3, Tables B-3-8 and B-3-9, pages B3-13 and B3-15: The source for the age weighted area is listed as being Appendix B-7. However, there is no Appendix B-7. This discrepancy should be corrected.

5. Appendix 3 references the sources of exposure parameters as assumptions. However, the bases of the assumptions are not addressed. Since these values will be used in all risk assessments, a full discussion of each exposure parameter is warranted. The discussion should be added accordingly.

Recommended Future Sections: As mentioned above, it was my understanding that the GIR would serve as a more comprehensive resource to be used by future Navy contractors as well as serve as a reference for future reports providing procedures and descriptions that historically been repeated in every report. The following is a list of items that we may want to consider adding to the GIR:

1. Data Reduction, Reporting and Data Validation. Because the Team agreed to reduce data validation and quality assurance requirements (ie. February 13, 1996 letter from M.Davidson), it is recommended that this information be added.

2. Updated Standard Operating Procedures Manual for NAS CF field laboratory services (March 17, 1996 letter from R.Angara).

3. Field program procedures and requirements including reference to any approved work plans (i.e. Field Investigation Plan for PSCs 4, 6, 9, 12, 18 and 19).
   A. Field Investigation Techniques and Procedures
   B. UXO
   C. Surface Geophysics
   D. Test Pits
   E. Drilling (geoprobe, monitoring wells, etc)
   F. Sampling Techniques
   G. Surface Water Hydrologic Measurements
   H. Aquifer Characterization
   I. Elevation Surveys

4. Approved Quality Assurance Project Plans (Navy operations, Contractor operations)

5. Investigation Derived Waste

6. Decontamination Procedures

7. Sample Handling and Custody Procedures

8. Equipment Calibration and Preventive Maintenance

9. Analytical Procedures

10. Internal Quality Control

11. Health and Safety Plans

12. Community Relations Plan

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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December 11, 1996

4WD-OTS

MEMORANDUM

SUBJECT: General Information Report, Cecil Field NAS, Jacksonville, Florida

FROM: William N. O'Steen, Environmental Scientist
Office of Technical Services
Waste Management Division

THROUGH: Elmer Akin, Chief
Office of Technical Services
Waste Management Division

TO: Debbie-Vaughn Wright, Remedial Project Manager, Federal Facilities, Base Realignment and Closure Team

This memorandum responds to your request for a review of the **General Information Report for the Cecil Field Naval Air Station.** In my review, I have focused on Chapter 26, Feasibility Study Methodology. I have one comment on this section of the General Information Report.

On page 26-9, the first sentence needs to be revised to indicate that Table 26-2 is an example of the chemical properties data which is tabulated for chemicals of concern in Operable Unit-specific documents. The report implies that the list of chemicals in Table 26-2 encompasses all chemicals of concern at Cecil Field NAS.

If you require additional assistance, please contact me at x28645.

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