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NAS CECIL FIELD, FL  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT RECORD OF  
DECISION FOR OPERABLE UNIT 3 (OU 3) SITE 7 NAS CECIL FIELD FL  
2/23/1998  
U S EPA REGION IV

32215-003  
05.07.03.0003



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

February 23, 1998

4WD-FFB

Commanding Officer  
Attn.: Mr. Mark Davidson  
SOUTHNAVFACENGCOM  
Post Office Box 190010  
North Charleston, South Carolina 29419-9010

Subject: Draft Record Of Decision, Operable Unit 3 (Site 7)  
NAS Cecil Field, Jacksonville, FL

Dear Mr. Davidson:

The U.S. Environmental Protection Agency has reviewed the subject document and offer the following comments:

**General Comments:**

1. It is a legal requirement that any final remedial action selected in a Record of Decision must be determined to attain each ARAR (unless an ARAR waiver is justified). *See*, CERCLA § 121(d)(2)(A) and 40 C.F.R. § 300.430(f)(1)(ii)(B). Based on descriptions of the preferred groundwater remedy in both the Proposed Plan and draft ROD, there is apparently an expectation that "natural attenuation" (Proposed Plan, p. 9) involving "degradation processes" (Draft ROD, p.2-23) will diminish the concentrations of contaminants over time. Because of the relatively small amounts by which the risk threshold and/or ARARs are now exceeded, there may well be technical justification for making the determination that, eventually, such natural attenuation will cause ARARs to be met. If so, the Draft ROD should be revised to make clear what is now merely implicit -- that "natural attenuation" is the groundwater remedy being selected, together with annual monitoring to gauge the progress of this remedy and groundwater use restrictions to protect public health until such time as natural attenuation processes have completed needed remediation. Further revisions to the Draft ROD should then be made stating the determination that ARARs will be attained by this remedy, and indicating that -- as required for any selected remedy during the time period when hazardous substances remain on site above health-based levels -- reviews of the remedy (considering data obtained from monitoring) will be conducted no less often than every five years after its initiation. If technical justification does not exist for a determination that ARARs will be attained, then 1) some other action which will attain ARARs must be selected; or 2) a waiver must be justified for any ARAR which will not be

attained; or 3) the groundwater action must be designated as an “interim” action, to be followed with a “final” action or decision in full compliance with legal requirements.

2. Considerably more specificity about the nature of the “groundwater-use restrictions” (Draft ROD, p. 2-23) being selected should be included in this ROD so that this portion of the groundwater remedy can be evaluated for implementability, effectiveness, and other required evaluation criteria. For example, details should be given about plans to request assistance of other government agencies in preventing the drilling of drinking water wells (as indicated on page 6 of the Proposed Plan). This topic was discussed during the February 18-19, 1998 BCT meeting in Tallahassee. As was decided among the team details regarding land use restrictions, a general discussion should be included in the Record of Decision and details shall be refined as part of the design plan or similar document.

### **Specific Comments:**

1. Section 1.4, pp. 1-1 to 1-2: This section should be expanded to include an overview of how the actions for Site 7, OU3 fit into the overall cleanup strategy for the NAS Cecil Field NPL Site, including a brief description of activities at other OUs. (Information from Section 2.4, p. 2-7 could be helpful here.)

2. Section 1.5, pp. 1-2 to 1-3: As indicated in General Comment 1 above, a determination that ARARs will (not may be) attained, unless waived, is required for any final remedial action selected. Additionally, a statutory determination is required that “ alternative treatment technologies or resource recovery technologies have been utilized to the maximum extent practicable.”

3. Section 2.2, pp. 2-3 to 2-4 : This section on history and enforcement activities should be expanded to include information about EPA’s inclusion of NAS Cecil Field Site on the National Priorities List and the subsequent conclusion of a Federal Facility Agreement for this Site.

4. Section 2.3, pp. 2-6 to 2-7: The second paragraph of this section indicates that comments received at public meetings (and, presumably, responses to them) are “presented in the responsiveness summary in Attachment A...” No such Attachment is included with the draft document I reviewed. If comments were received on the Proposed Plan, a responsiveness summary is required in this ROD. (If none were received, this ROD should so state.)

5. Section 2.7.2, pp. 2-21 to 2-23: Because of a typographical error, the second groundwater alternative is headed “Excavation and Disposal.” Consistent with General Comment 1 above, this alternative should be named “Natural Attenuation with Annual Monitoring” or something similar. Also, as indicated in General Comment 2 above, more specificity is needed about the “groundwater-use restrictions” being selected to protect public health until such time as natural attenuation has achieved the remediation goals. The statement that “chemical-specific ARARs will not be met in the short term” should be eliminated, because the only appropriate time for assessing whether ARARs are met is after the remedy is complete. If future monitoring data

indicates that ARARs are not being met through natural attenuation , then reevaluation of the natural attenuation remedy should be done (as it should with any unsuccessful remedy).

6. Table 2-2, p. 2-26: This table should be revised to indicate that natural attenuation, with the groundwater use restrictions being implemented will provide overall protection to human health and will, over time, comply with ARARs. (If these statements cannot be made, then the remedy may not legally be selected. See General Comment 1 above.)
7. Section 2.10, pp. 2-27 to 2-28: In the third sentence in this section, replace “ARARs” with “requirements” (because all the requirements listed in Table 2-3 are not ARARs).
8. Section 2.11, p. 2-30: See comment above for Section 2.3 concerning responsiveness summary requirements.
9. It would be beneficial for Figure 2-8 and Figure 2-9 to indicate the general direction of ground-water flow at Site 7.
10. On page 2-17, the discussion of ground-water is states that antimony contributes to the HI for a resident child. Neither the discussion of ground-water analyses on page 2-13 nor Figure 2-9 indicate the presence of antimony in the ground water at Site 7. If this metal was detected in the ground water, the ROD needs to indicate the location of the antimony “detects”.
11. The discussion of ground-water alternative 7GW2 on page 2-23 includes the statement “Over time, the toxicity, mobility, and volume of the contaminants could be reduced.” This assessment is very tenuous, and implies that the remedial alternative has a good chance of being ineffective. I would recommend wording this statement differently, if supportable, to indicate that reductions of some sort are anticipated. Table 2-2 indicates that at a minimum, some reduction in the benzene in the ground water will occur over time under this alternative.
12. I recommend adding monitoring well CFMW1S to the monitoring program for ground-water alternative 7GW2, since Figure 2-8 shows that several organic compounds were detected here, two of which were present at levels only slightly below the state’s guidance concentrations.
13. Page 1-1, Section 1.1, last sentence: Delete the word active. Aircraft hangers 13 and 14 are no longer active.
14. Page 2-3, Section 2.1: Suggest rewording the last two paragraphs in this section. Attached is an annotated copy showing the suggested changes.
15. Page 2-7, Section 2.3, first paragraph: The text states that two public meetings were held. No public meetings were held. All information was distributed at regular monthly RAB meetings. The community was given an opportunity to request a formal public meeting

and the RI/BRA/FS and Proposed Plan were available for review at the Library. This should be clarified in the discussion.

16. Page 2-7, Section 2.3, first paragraph: No attachment A was attached. Also, during a recent BCT meeting we discussed whether comments received during the RAB meeting were to be considered as formal comments. It was decided that the comments made during the RAB meeting were not part of the formal comment period and that members of the RAB may submit comments separately.
17. Page 2-7, Section 2.4, first paragraph, second sentence: "As a result, work at the various sites has been organized into eight Operable Units ~~installation restoration~~ OUs along with more than 100 other areas undergoing evaluation in the Base Realignment and Closure and underground storage tank programs.
18. Page 2-27, Section 2.9.1, second sentence : "Excavated soil will be characterized and disposed of ~~properly~~ in either a subtitle D or C landfill dependent on soil characteristics.
19. Page 2-27, Section 2.9.2, last paragraph: If accurate, suggest adding "Presently the NAS Cecil Field Reuse Plan specifies using City of Jacksonville potable water supplies."

If you have any questions please call me at 404/562-8539.

Sincerely,



Deborah A. Vaughn-Wright  
Remedial Project Manager

cc: Mike Deliz, FL DEP  
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