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NAS CECIL FIELD, FL
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT FINAL
PROPOSED PLAN FOR OPERABLE UNIT 5 (OU 5) SITE 15 BLUE 10 ORDNANCE
DISPOSAL AREA NAS CECIL FIELD FL
4/8/2008
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

April 8, 2008

EMAIL & US MAIL

4SD-FFB

Barbara Nwokike
BRAC PMO SE
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

Subject: EPA Comments on the Revised Proposed Plan for OU 5, Site 15; Naval Air Station, Cecil Field, Florida

Dear Ms. Nwokike:

The Environmental Protection Agency (EPA) has reviewed the subject document and has the enclosed comments. Please consider these comments in the draft final Proposed Plan. If you have any questions, please call me at (404) 562-8549.

Sincerely,

A handwritten signature in black ink that reads "Doyle Y. Brittain".

Doyle Y. Brittain
Senior Remedial Project Manager

Enc.

cc: David Grabka, FDEP
Mark Speranza, TTNUS
Mike Halil, CH2MHill

EPA Comments on the Draft Revised Proposed Plan for OU 5, Site 15

General Comments

1. Overall most of the content in this Proposed Plan is useful and provides most of the information required by the NCP. However, as mentioned before on the original Proposed Plan for Site 15, the nomenclature for the Section headings and certain terms of art do not match EPA Guidance in many cases. Several of the Specific Comments below suggest use of EPA guidance terminology and adherence to the EPA *Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Documents* [OSWER 9200.1-23P, July 1999](hereinafter referred to as the Decision Document Guide) format for a Proposed Plan. Consequently, use of terms such as ‘cleanup’ instead of ‘remedial action’ and ‘proposed cleanup plan’ instead of ‘Preferred Alternative’ in many instances could be confusing to the public.

Most of the Navy’s responses to EPA comments on the original Proposed Plan indicated that the format would remain unchanged. The EPA disagreed with several of the responses and yet this version of the “Revised” Proposed Plan carries over most of the objectionable text and format. Consequently, the EPA is repeating some of those comments and expects the Navy to incorporate them prior to approval of the document.

2. One of the primary purposes of the Proposed Plan is to satisfy the “Community Participation” requirements of the NCP at 40 CFR 300.430(f)(2) and(3). Accordingly, use of that term as a Section heading and organization of the content of this document to clearly inform the public of their opportunity to participate in the remedy selection process is highly recommended. As stated below, there should be an *Introduction* Section that explains why the Navy is issuing another Proposed Plan due to change in site information and treatment technologies.
3. The name of the new Preferred Alternative 3C: *Excavation to Meet Recreational RAOs, On-site Solidification/Stabilization, Off-Site Treatment and Disposal, and LUCs* is a somewhat confusing and cumbersome. Recent discussions with the Navy and its contractor indicated that all of the treatment of the contaminated soils considered RCRA hazardous waste would be done on-site. Consider shortening the title of Alternative 3C to *Excavation to Meet Recreational RAOs, On-Site Treatment and Off-Site Disposal, and LUCs*.

Specific Comments

1. **Title of Document** – Since this Proposed Plan is the second Proposed Plan for Site 15 that is provided to the public for comment there should be some obvious distinction between the two documents, especially if one was reviewing the Administrative record file. Please add the word ‘Revised’ to the beginning of the title of this Proposed Plan.
2. **Major Sections** – EPA’s Decision Document Guide Chapter 3 provides an outline for the major Sections and contents of the Proposed Plan. Although the Navy is not required to

follow the Guide as a matter of law, the EPA believes both the names and sequence of Section Titles are important in presenting information about the Facility and Site 15, the role of the proposed remedial action in regard to the cleanup of the entire Cecil Field facility, site risks, remedial alternatives, the Preferred Alternative, and inviting Community Participation. [Reference Guide p. 3-2] The Sections that are formed as questions are not especially helpful in most instances and this style is not consistent with EPA guidance. Organization in a logical order is important.

Accordingly, EPA suggests that the names and sequence of the Sections be as follows: *Introduction, Facility Background, Site Characteristics, Scope and Role of Proposed Remedial Action, Summary of Site Risks, Remedial Action Objectives and Cleanup Goals, Summary of Remedial Alternatives, Preferred Alternative, and Community Participation.* Fortunately, most of the existing text can be located in these Sections by simply “cut and paste” editing and revising text and/or deleting the original Section titles.

3. **Add *Introduction* Section, Page 1** – This Section is necessary considering the discovery of UXO and determination that more soil would be considered RCRA hazardous waste that actually resulted in the Navy changing its Preferred Alternative. Consequently, please explain why the Navy decided to issue another Proposed Plan with another Preferred Alternative that was not identified in the original FS. Also, include a sentence that identifies the Preferred Alternative for Site 15 and refers to the Amended FS Report. See Chapter 3.3.1 of the EPA’s Decision Document Guide for an explanation of the content of this Section.
4. ***Introduction* Section, Page 1** – Consistent with the comment above and EPA’s Decision Document Guide, please cut and paste the text from the “About this Document” section of the document on Page 5 into the *Introduction* Section.
5. ***Facility Description*, Page 1** – Consider changing the title of this Section to *Facility Background*. In addition, the list of RODs that have been approved for OUs at Cecil Field provided in the third full paragraph of the “Why is Cleanup Needed?” section on p. 6 should be relocated into this *Facility Description* Section or *Scope and Role of the Proposed Remedial Action* Section.
6. ***Site Description*, Page 1** – Consider changing the title of this Section to *Site Characteristics*. Also, please add a brief description of the UXO discovery and any removal activities to date despite that these were not done as CERCLA action.
7. ***The Proposed Cleanup Plan Text Box*, Page 1** – Consider renaming text box as “The Preferred Alternative”. Also, add a bullet in front of the text describing post-remedial action monitoring of groundwater near the areas where the arsenic contaminated soils are excavated to verify that there is no adverse impact to the groundwater.
8. ***About this Document*, Page 5** – As mentioned above, the text in this section should be relocated into the *Introduction* section. Also, revise the text to indicate that the Navy and EPA select the remedy and delete the reference to the RAB as being part of that remedy

selection process. In addition, the reference to the Feasibility Study Reports should make clear that there is an Amended FS Report that describes this new alternative 3C.

9. ***Summary of Site Investigations Text Box, Page 5*** – Add a bullet that discusses the sampling events and data that resulted in twice the amount of soil considered hazardous waste needing to be excavated to meet RAOs. Suggested text for bullet: “Field sampling in spring of 2007 resulted in discovery of UXO and revised estimates on the amount contaminated soil that could be considered hazardous waste once excavated.”
10. ***Why is Cleanup Needed?, Page 6*** – Delete this title and “cut and paste” the text that relates to the “Basis For Taking Action” (except for the last paragraph that lists the RODs for OUs) into the *Summary of Site Risks* Section.
11. ***What are the Cleanup Objectives and Levels?, Page 7*** – Consider revising this title to *Remedial Action Objectives and Cleanup Goals*.
12. ***What are the Cleanup Objectives and Levels?, last paragraph, Page 7*** – Please indicate whether the FS or Amended FS Report contains the information about the recreational use clean-up goals.
13. ***Cleanup Alternatives for OU 5 Site 15, Page 6*** – Consider revising this title to *Summary of Remedial Alternatives*. Revise to reflect that Alternative 3C (not 3A) is the Preferred Alternative. Also, indicate that the FS and Amended FS contain a description of the remedial alternatives.
14. ***Alternative 3C Sub-Section, Page 8*** – Clarify in this paragraph that RCRA requires treatment of hazardous wastes (namely characteristically hazardous soils contaminated with lead) and requires compliance with Land Disposal Restrictions before disposal. In addition, add a sentence that more clearly explains that the on-site treatment is expected to meet the RCRA LDR alternative treatment standard for soil and render the waste non-characteristically hazardous. Should also specify estimated costs for this alternative since that was one of the main reasons the Navy decided to change preferred alternatives.
15. ***Use of ARARs in the Evaluation Process, Page 9*** – Delete this title and relocate the text to the *Detailed Analysis of Cleanup Alternatives* Section below since this information relates to ‘Compliance with ARARs’ criteria applied in the FS process.

Suggest revising the ARARs paragraph as follows and using in the *Glossary*: “ARARs are federal and more stringent State environmental requirements that on-site remedial actions are required to comply with under CERCLA Section 121(d) and the NCP [40 CFR 300.430(f)(1)(ii)(B)]. The chemical-, location-, and action-specific ARARs that were used in evaluation of the remedial alternatives and potentially apply to the remedial action for OU 5 Site 15 are listed in Section 2 of the FS Report. Each Alternative has been evaluated to determine its compliance with ARARs in accordance with CERCLA and the NCP.”

16. ***Detailed Analysis of Cleanup Alternatives, Page 9*** – Consider revising this title to *Evaluation of Alternatives*. Revise the last sentence in the first paragraph to reflect that more detailed information is in the Amended FS Report as well as the FS Report.

Although Table 2 provides summary level comparison, the absence of any text in this Section of the document summarizing the comparative analysis of each alternative against the criteria is inadequate. See Section 3.3.8 of the Decision Document Guide for guidance on what this narrative discussion in this Section should contain. At a minimum, there should be a sub-section for each of the nine criteria with a brief paragraph or two below explaining how each of the alternatives met the criteria.

17. ***Detailed Analysis of Cleanup Alternatives, Page 9*** – Insert the text from the three bullets listed in the *What impacts would cleanup have on the local community?* on p. 11 as part of the criteria paragraphs in the *Evaluation of Alternatives* Section. The bullets summarize an aspect of the detailed analysis performed as part of the FS and could be considered part of the Long-Term, or Short-Term Effectiveness, or other criteria analysis. Consequently, this information should be in the *Evaluation of Alternatives* Section under the sub-section for the appropriate criteria.
18. ***Detailed Analysis of Cleanup Alternatives, Page 9*** – Revise the second paragraph to read as follows: “Based upon the analysis performed by the Navy, EPA and FDEP that is documented in the Amended FS Report, the Preferred Alternative 3C, provides the best balance among the alternatives with respect to the NCP’s evaluation criteria. Relocate this sentence to the end of the *Evaluation of Alternatives* Section since it is a conclusion statement or use as the first sentence in the Preferred Alternative Section.
19. ***Detailed Analysis of Cleanup Alternatives, Page 9*** – Revise the first sentence of third paragraph to read as follows: “State concurrence with the Preferred Alternative was obtained through the review and approval of the Amended FS Report by FDEP. Community acceptance will be determined through the publication of this Proposed Plan and solicitation of their input on the Preferred Alternative during public comment period.” Revise then relocate the last sentence to the *Introduction* or the *Community Participation* Sections. Revise as follows: “During the public comment period, the Navy, EPA and FDEP welcome comments and/or suggestions on the Preferred Alternative and the other remedial alternatives that were evaluated.”
20. ***A Closer Look at the BCT’s Proposed Cleanup Plan, Page 9*** – Consider revising this title to *Preferred Alternative*.
21. ***A Closer Look at the BCT’s Proposed Cleanup Plan, numbered paragraph 1, Page 9*** – Must clarify with additional sentence that treatment is required to meet RCRA LDRs, specifically treatment standard for soil before disposal, not just to determine whether it remains characteristically hazardous. See Comment #14 above.

22. **Table 2** – Revise text in the cells that refers to BaPEq to include lead since this is the hazardous constituent that is causing the soil to be considered RCRA hazardous waste and which concentrations must be reduced to meet LDR treatment standard.
23. **A Closer Look at the BCT's Proposed Cleanup Plan, 1st full paragraph, Page 11** – This paragraph alludes to the 5 Year Reviews required under CERCLA 121(c) and seems out-of-place especially considering the paragraph following the LUCs sub-section that also refers the 5 Year Review.

Suggest revising this sentence in conjunction with revisions to that paragraph as follows: “Since hazardous substances remain at the site above levels that allow for unlimited exposure and unrestricted use, the Navy will review the remedial action no less than every five (5) years after initiation of the remedial action per CERCLA Section 121(c) and the NCP at 40 CFR300.4309f(4)(ii). If results of the five-year reviews reveal that remedy integrity is compromised and protection of human health is insufficient, then the additional remedial actions would be evaluated by the parties and implemented by the Navy.”

24. **A Closer Look at the BCT's Proposed Cleanup Plan, last paragraph, Page 11** – Replace the term ‘proposed cleanup plan’ with the term ‘Preferred Alternative in both the first and second sentences.
25. **What impacts would the cleanup have on the local community?, Page 11** – Consider deleting this Section. All of the bulleted items provide information on how each of the alternatives potentially impacts the community or other aspects of the NCP evaluation criteria. Accordingly, this information should be moved to the *Summary of Remedial Alternatives* Section.
26. **Why Does the BCT Recommend this Cleanup Plan?, Page 11** – The text in the two bullets should be “cut and pasted” into either the end of the *Evaluation of Alternatives* Section or the *Preferred Alternative* Section since they relate to how well the Preferred Alternative addresses several of the criteria.
27. **Next Steps:, Page 11** – Please revise this title to *Community Participation*. Include a sentence that directs the public to the text box “What’s a Formal Comment”” and the Public Comments form for written comments. Also, note the date of May 8 is contingent on the approval of several documents and might have to be revised.
28. **Glossary of Terms, Page 11** – This should be a separate attachment at the end of the document or provided in a text box that is referenced earlier in the document such as in the *Summary of Remedial Alternatives* Section or *Preferred Alternative* Section.
29. **Glossary of Terms, ‘RCRA’ Page 13** – Please revise to reflect that implementing regulations issued by EPA that specify requirements for managing hazardous waste from the point of generation (not groundwater) until properly treated and disposed of in

acceptable facility. Revise to reflect that waste characterization is made following the requirements of RCRA regulations as opposed to “procedures under RCRA.”

30. ***Glossary of Terms, ‘TCLP’ Page 13*** – Please revise to reflect that this procedure is required by RCRA regulations to determine if a solid waste is also a hazardous waste. Also, revise to indicate that hazardous waste must be managed and disposed of according to RCRA regulations.
31. ***Comments Form, Page 15*** – Suggest addition of a *Public Comments Form* title at the top of the page.
32. ***Next Steps, Page 11*** – Please change the date for signature of the ROD.