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NAS CECIL FIELD, FL
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT PROPOSED
PLAN FOR OPERABLE UNIT 9 (OU 9) SITE 36 AND 37 NAS CECIL FIELD FL
5/5/2000
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

NAS Cecil Field Administrative Record
Document Index Number

32215-009

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May 5, 2000

4WD/FFB

Commander

Attn: Mark Davidson

Mail Code 1879

Southern Division

SOUTHNAVFACENGCOM

P.O. Box 190010

North Charleston, South Carolina 29419-9010

Subject: Draft Proposed Plan for Operable Unit 9, Sites 36 and 37, Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has completed its review of the subject report and our comments are attached. EPA concurs with the proposed selected remedies, however, we have concern on the timing for initiation of the contingency remedy should the groundwater plume migrates beyond its current boundary and the overall presentation of the contingency remedy. Further details are provided in our attached comments.

EPA appreciates the opportunity to review the draft proposed plan and looks forward to continued partnering regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Deborah A. Vaughn-Wright".

Deborah A. Vaughn-Wright
Remedial Project Manager

cc: Scott Glass, SOUTHDIV
Mike Deliz, FDEP
Marl Speranza, TTNUS
Norm Hatch, CH2M Hill

Proposed Plan for Operable Unit 9, Sites 36 and 37, Draft March 2000:

1. The Environmental Protection Agency's guidance on monitored natural attenuation (OSWER Directive 9200.4-17p) and EPA guidance on remedial actions generally allow for considerable flexibility in remedial time frames for attainment of ARARs. However, EPA does strongly discourage remedial actions that result in a significant expansion of contaminant plumes into previously uncontaminated areas. The proposed remedy calls for air sparging in the "hot spots" of the groundwater plumes, monitored natural attenuation downgradient and for a contingency action if the leading edge of the contaminant plume (identified by the benzene concentration of 1 $\mu\text{g/L}$) would migrate downgradient as much as 400 feet. This alternative was agreed upon by the BCT of which EPA is a partner.

However, after further consideration, EPA is recommending an alternative to this scenario. To wait until the plume reaches 400 ft past the current leading edge, may allow the plume to actually move further while a contingency remedy is being evaluated and funding obtained. EPA would like to recommend that the contingency remedy be phased. For example, if the plume does expand greater than 200 feet past the current leading edge of the plume, remedial alternatives will be evaluated which would control further migration and groundwater modeling be conducted based on the most current data. If modeling continues to show plume expansion, the Navy will then be prepared to initiate active remediation if the plume does indeed migrate 400 feet. This variation on the agreed upon alternative will need to be discussed by the BCT.

2. EPA also recommends that the need for initiating the contingency remedy be based on the Federal MCL of 5 ppb for Benzene rather than the Florida GCTL of 1 ppb. Remedial action may be triggered by the State MCL of 1 ppb, but the initiation of the contingency remedy evaluation can be triggered by the Federal MCL of 5 ppb. This option will need to be discussed by the BCT.
3. Facility Description: the base was largely transferred to the City of Jacksonville and is now referred to as the _____
4. Site Description: The proposed plan does not have to include soil. The soil is being handled under the FDEP Petroleum Program, NOT CERCLA. Make a simple statement that the soil only showed concentrations of petroleum products and will be addressed under the State
5. Proposed Clean-Up Plan box: first bullet add "under the FL petroleum program"
6. Site Description: Recommend adding - "Operable Unit 9 (OU9) consists of groundwater contamination identified at Sites 36 and 37. This Proposed Plan addresses the proposed remedy for groundwater contamination at OU 9. Site 36 consists of"

7. This Document: " In accordance with Section 117, the law that established the Superfund Program, and §300.430(f)(2) of the National Oil Hazardous Substances Contingency Plan (NCP), this document summarizes "
8. This Document: " The BCT, in consultation with the Restoration will select a new final remedy..."
9. This Document: last sentence add where the Administrative Record is located.
10. Site History Box: Delete bullet for 1998 to 2000. This does not pertain to sites 36/37. True these PSC's are located above sites 36/37 but they are separate. To include them here only confuses the issue.
11. Why is Clean-up Needed: 1st sentence - add comma after 37.
12. Page 6, Monitoring: It is confusing to simply through out 400 feet and not explain why. Suggest adding it is the location of the sentinel wells.
13. Use of ARARs in Evaluation Process: Last sentence add " found in the Administrative Record".
14. Clean-up Alternatives for OU9 box: 2nd paragraph, " These clean-up alternatives are summarized below in Table 2."
15. Table 3: Need to expand discussion of 9 criteria for selected remedy. Need more than a check in the box.
16. Add section explaining contingency. Placement of sentinel wells, triggering end points, types of contingency.
17. Summary of Site Risks: Add the following " As a screening level assessment, a PRE is a very health-protective method. Because of the use of maximum concentrations and protective exposure assumptions, a PRE is almost always more protective than a baseline risk assessment at the same site."
18. In the statement on page 13 about the recommendation for the proposed ground-water remedial alternative, I recommend qualifying the point about the costs of Alternatives 3C, 3D, and 5 to indicate that the costs are prohibitive given the absence of current receptors and the limited potential for use of the groundwater within the time required for remediation. Though costs is a consideration in remedy selection, it is much less important than protection of human health and environment.