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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 9 (OU 9) SITE 36 AND SITE 37 NAS CECIL FIELD FL  
12/13/2000  
U S EPA REGION IV



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

December 13, 2000

4WD-FFB

Commander  
Department of the Navy  
SOUTHNAVFACENGCOM  
Attn: Mr. Scott Glass  
Mail Code 18B12  
P.O. Box 190010  
North Charleston, South Carolina 29406

Subject: Draft Record of Decision, Operable Unit 9, Sites 36 and 37, Naval Air Station  
Cecil Field, Jacksonville, Florida

Dear Mr. Glass:

In follow-up to the on-board review that was conducted during the December 5, 2000, BCT meeting, below are my comments:

1. Page 1-1, Section 1.3: Revise this section to include a statement that identifies the existence of a release of hazardous substances into the environment. Wording was agreed upon during the meeting.
2. Page 1-1, Section 1.4: For consistency either the sites should be listed with their respective Operable Units or the site names should be left off. As was agreed OU10 (PSC 21 and 25) and OU11 (PSC 45), should be added to the list of operable units that require a remedial investigation. OU12 will not be listed because it consists only of sites with removal actions.
3. I agree with your comments regarding deleting reference to Institutional Controls for the surficial groundwater aquifer "for drinking purposes"... The institutional controls should pertain to all aspects of groundwater usage not just drinking.
4. Page 1-3, Section 1.5, 2<sup>nd</sup> sentence: Should be revised to clearly indicated the remedy is for "monitored" natural attenuation. Wording was agreed upon during the meeting.
5. Within the Declaration, the ROD should include a ROD Data Certification Checklist. Section D from the July 30, 1999 ROD Guidance was provided at the meeting. The entire document may be found at [www.epa.gov/oerrpage/superfund/index.htm](http://www.epa.gov/oerrpage/superfund/index.htm).
6. Page 2-1, Section 2.1, 6<sup>th</sup> sentence: Most of the facility "has been" transferred. Wording was agreed upon at the meeting.
7. Page 2-1, Section 2.1, 5<sup>th</sup> paragraph: Add language specifying the planned reuse.

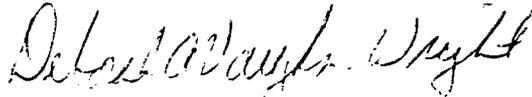
for this section was not worked out during our meeting, please provide a copy prior to finalizing the ROD.

30. Page 2-31: Please include the complete names of the chemical of concern.
31. Page 2-31, Section 2.6, 2<sup>nd</sup> paragraph: Please explain which "hot spot" is being referenced in the last sentence.
32. Page 2-32, The table identifying the PRG's for groundwater appears to have several errors. Please verify the PRG for Toluene, Ethylbenzene, and 2-Methylphenol. The values given in the draft ROD are different from those given in the Proposed Plan.
33. Page 2-32, section 2.8, 2<sup>nd</sup> paragraph, 1<sup>st</sup> sentence: Please add that the eleven remedial alternatives were evaluated to the ARARs identified in Tables 2-4 thru 2-7. Wording was agreed upon during the meeting.
34. Page 2-33, Section 2.8: For all alternatives described, please make sure that the ARARs Tables are referenced

Because of the nature of the onboard review and that several other changes were recommended by the team, please provide a response to comments summary that identifies all major changes. I would also recommend that an electronic copy be forward to the entire team prior to finalizing the ROD so that changes can be verified.

Thank you for the opportunity to review the draft ROD fro groundwater remediation at Operable Unit 9. If you have any questions regarding my comments please contact me at (404) 562-8539 or at [vaughn-wright.debbie@epa.gov](mailto:vaughn-wright.debbie@epa.gov).

Sincerely,



Deborah A. Vaughn-Wright  
Remedial Project Manager

cc: David Grabka, FDEP  
Mark Davidson, SOUTHDIV  
Mark Speranza, TTNUS  
Sam Ross, J.A. Jones