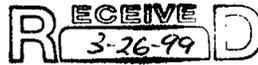


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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DECISION  
DOCUMENT AND RESPONSIVENESS SUMMARY FOR SITE 3, SITE 7 AND AREA OF  
CONCERN B NAS KEY WEST FL  
3/23/1999  
U S EPA REGION IV

MAR 23 1999



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Mr. Dudley Patrick  
Code 1852  
Southern Division Naval Facilities Engineering Command  
P.O. Box 190010  
Charleston, S.C. 29419-9010

SUBJ: Naval Air Station (NAS) Key West, Florida  
EPA ID# FL6 170 022 952

Dear Mr. Patrick:

EPA has received and reviewed the following document:

- o **Decision Document and Responsiveness Summary - IR3, IR7 and AOC B, TtNUS, January 1999.**

EPA's comments are enclosed with this letter. If you have any questions, please contact me at 404.562.8533.

Sincerely,

Martha Berry  
Remedial Project Manager  
Federal Facilities Branch

Enclosure

cc: Jorge Caspary, FDEP  
Ron Demes, NAS Key West  
Phillip Williams, NAS Key West  
Charles Bryan, TtNUS

EPA Comments  
Decision Document and Responsiveness Summary  
IR3, IR7 and AOC B  
Naval Air Station Key West  
TtNUS, January 1999

1. Declaration, General Comment - If the intent is to make the Decision Document similar in form and content to a ROD, then the "Declaration" chapter should be revised. I have enclosed a copy of a "Declaration" from a recent NAS Jacksonville ROD as an example.
2. Section 2.2.1.1 - The last sentence in the last paragraph should be rewritten - as it reads now, it sounds as though the whole plot contains these levels.
3. Section 2.3, Scope and Role - I suggest significantly shortening this section. This section's purpose is to state what media will be addressed by the remedy and why. Discussion of the remedy is premature.
4. Section 2.5.2.3 - The section addressing the AOC B Environmental Evaluation seems incomplete. The conclusions are missing.
5. Section 2.7 - Sections 2.7.1 and 2.7.2 refer to the threshold criteria, which must be met by any remedy selected under CERCLA. After the threshold criteria are met, then the remedial alternatives are compared to each based on the following balancing criteria: long-term effectiveness and permanence; reduction of toxicity, mobility or volume through treatment; short-term effectiveness; and cost. After a remedy has been proposed and put out for public comment, then the final two criteria of state and community acceptance are applied. If the intent of this DD is to mimic a ROD, Section 2.7 should be rewritten to reflect the nine criteria in the NCP.
6. Section 2.7.2 - The first sentence of the first paragraph is very long and confusing. Also, in the second paragraph, IR3 and IR7 are mentioned, but AOC B is not.