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NAS KEY WEST  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON PROPOSED PLANS FOR  
ELEVEN BASE REALIGNMENT AND CLOSURE SITES NAS KEY WEST FL

6/29/1999

U S EPA REGION IV

RECEIVED  
7-7-99

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

June 29, 1999

4WD-FFB

Mr. Dudley Patrick - Code 1858  
 Southern Division  
 NAVFACENGCOM  
 2155 Eagle Drive  
 North Charleston, South Carolina 29419-9010

Re: EPA comments on Proposed Plans for 11 BRAC sites at NAS Key West

Dear Mr. Patrick:

The United States Environmental Protection Agency (EPA) has reviewed the subject documents and finds them to be substantially compliant with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP), with a few minor exceptions. EPA comments are noted below. Please make the necessary changes prior to issuing the final proposed plans for public comment.

Comments

Q A Record

Of the 11 BRAC sites considered, three are proposed for no further action (NFA) based on site investigation results, previous removal actions, and confirmation sampling after the removal actions. EPA concurs with the no-action alternative for these sites.

At the remaining eight sites, the Navy is proposing land use controls (LUC) to supplement the soil removal work already performed. EPA concurs that LUCs are appropriate for these sites in order to prevent exposures under certain land use scenarios, primarily restricting the sites from residential development.

However, the presentation of the proposed remedy in the document is not consistent with certain areas of the NCP. Specifically, in the "Proposed Remedy" and "Scope of the Remedial Action" sections, the Navy has stated that the proposed remedy is no further action with land use controls. Under the NCP, land use controls are considered to be remedial actions. Therefore, any remedy that includes or relies solely on LUCs is not a no-action remedy.

Additionally, although the costs to implement the LUCs may be minimal, those costs need to be provided in the proposed plans and decision documents.

The document must provide more specific language as to the nature of the LUCs, how they will be implemented, and how they will be monitored to ensure the uses to which the land is put are consistent with the restrictions.

In the "Facility Background" sections of most of the eight documents, site features such as sidewalks, roadways, and building foundations are considered to be engineering controls that would prevent exposure to soil contaminants that exceed clean-up criteria, and which were impracticable to remove during the previous clean-up action. If these site features are to be relied upon as intended, they must be specifically detailed and assurances provided that they will not be removed in the future in such a way as to leave unacceptably high concentrations of soil contaminants available for human or ecological exposure. In addition, this information will have to be placed in all future transfer documents.

As you can see, these comments go toward how the proposed remedies are documented and implemented, rather than offering any dissent with the remedies themselves. EPA has reviewed the Supplemental Site Inspection Report on which these proposed plans are based, and the comments provided above also apply to similar language contained in that document. If you have any questions, please call me at 404/562-8553.

Sincerely yours,



Wm. Turpin Ballard, CHMM  
Remedial Project Manager

cc: Jorge Caspary, FDEP  
Chuck Bryan, TtNUS (via e-mail)  
Phillip Williams, NASKW