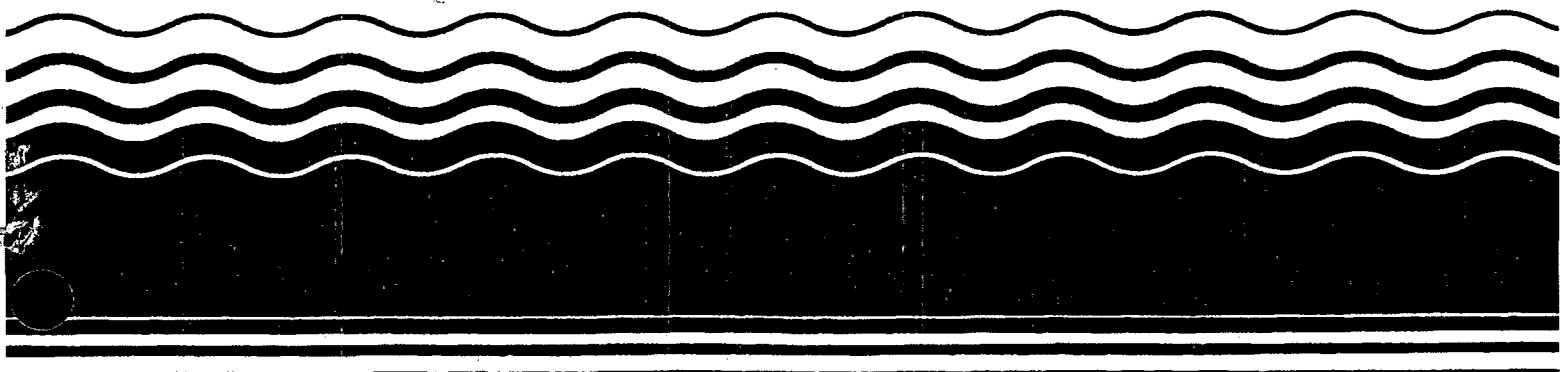


**PB99-963118
EPA541-R99-089
1999**

**EPA Superfund
Explanation of Significant Difference
for the Record of Decision:**

**Cecil Field Naval Air Station OU 4
Jacksonville, FL
7/12/1999**





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

July 12, 1999

+WD-FFB

Commanding Officer
Attn: Scott Glass
BRAC Environmental Coordinator
DON, Southern Division
Naval Facilities Engineering Command
Mail Code 18B12
P.O. Box 190010
North Charleston, South Carolina 20419-9010

Subject: Naval Air Station Cecil Field, Jacksonville, Florida
Explanation of Significant Differences (ESD), Operable Unit 4 (Site 10)

Dear Mr. Glass:

The U.S. Environmental Protection Agency (EPA) has reviewed the Explanation of Significant Difference (ESD) for Operable Unit 4 (site 10) and concurs with the changes. The Record of Decision for OU 4 was approved in September 1997, for no further action. Subsequent analysis of the soil data identified a small area that exceeded the State of Florida Residential Soil Cleanup Target Levels but was within EPA's risk criteria range. The Base Cleanup Team made the decision that it would be more economical, be protective of human health and the environment, and would benefit future development needs if the soil was removed rather than apply institutional controls to limit future residential reuse.

The significant difference to the Record of Decision is to remove approximately 276 cubic yards of soil that was contaminated with arsenic at levels above Florida Department of Environmental Protection Residential Soil Cleanup Target levels but within EPA's risk criteria range. This change to the ROD constitutes a significant change in that soil will be removed, however, the final remedy for no further action shall remain the same. Therefore the ESD is approved as adequate for its intended purpose of notifying the public of a change to the selected remedy.

Should you have any questions please contact me at 404/562-8539.

Sincerely,

Deborah A. Vaughn-Wright
Remedial Project Manager

cc: Mr. Michael Deliz, FDEP
Mr. Mark Speranza, TTNUS
Mr. Norm Hatch, CH2M Hill
Mr. Dave Kruzicki, NAS Cecil Field

V-WRIGHT

DW
7/12/99

BOZEMAN

EPB
7/13/99



DEPARTMENT OF THE NAVY

SOUTHERN DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

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28 Jun 1999

Ms. Deborah A. Vaughn-Wright
Remedial Project Manager/Federal Facilities Branch
EPA Region 4-Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960

Subj: EXPLANATION OF SIGNIFICANT DIFFERENCE (ESD), OPERABLE UNIT (OU) 4,
(SITE 10), NAVAL AIR STATION (NAS) CECIL FIELD JACKSONVILLE, FLORIDA

Dear Ms. Vaughn-Wright:

Please find enclosed the Declaration for the ESD for OU4. The ESD has also been made available for public review.

If you have any questions, please contact me at (843)-820-5587.

Sincerely,

SCOTT A. GLASS, P.E.
BRAC Environmental Coordinator
Environmental Department

Encl:

(1) Declaration for the Explanation of Significant Differences

Copy to:

FDEP (Mr. Mike Deliz)
NAS Cecil Field, Environmental (Mr. David Kruzicki)
Tetra Tech NUS, Pittsburgh (Mr. Mark Speranza)
Tetra Tech NUS, Jacksonville (Ms Abby Wilcox)
CH2MHill (Mr. Norm Hatch)



DECLARATION FOR THE EXPLANATION OF SIGNIFICANT DIFFERENCES

Site Name and Location

Operable Unit 4, Rubble Disposal Area (Site 10)
Naval Air Station Cecil Field, Jacksonville, Florida

Statement of Basis and Purpose

The Navy has prepared an Explanation of Significant Differences (ESD) for Operable Unit (OU) 4, Rubble Disposal Area (Site 10) at Naval Air Station (NAS) Cecil Field, Jacksonville, Florida. The ESD is issued as part of the public participation requirements under Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Section 300.435(c)(2)(i) of the National Contingency Plan (NCP), and the Navy Installation Restoration (IR) Program. The ESD is part of the Administrative Record for OU4.

The Navy, in conjunction with the U.S. Environmental Protection Agency (USEPA) and the Florida Department of Environmental Protection (FDEP), selected a cleanup remedy (as documented in the September 1997 Record of Decision [ROD] for OU4).

The Navy has considered and adopted a change in the cleanup remedy for OU4. The original cleanup remedy was No Further Action. Based on the reevaluation of site data, soil excavation and offsite disposal will be conducted as an Interim Removal Action. Once this action is completed, the final cleanup remedy will still be No Further Action. The Navy has obtained concurrence from the USEPA and the FDEP on the modification to the cleanup remedy.

Assessment of the Site

Actual or threatened releases or hazardous substances from OU4, if not addressed by implementing the remedy selected in the ROD for OU4 and amended by this ESD, may present a current or potential threat to public health, welfare, or the environment.

Description of Selected Remedy and the Significant Differences

The selected remedy for OU4 was No Further Action. Although contaminants, pathways, and receptors were identified to be present at OU4, the risks calculated for current or potential human and ecological receptors being exposed to the soil and groundwater did not exceed the USEPA acceptable risk criteria. According to USEPA guidance, if no risk to human health or the environment is identified, no further remedial action is warranted at the site to ensure protection of human health and the environment.

Based on the reevaluation of soils data at OU4, arsenic was identified at concentrations in excess of the FDEP residential Soil Cleanup Target Level (SCTL) and the background "High Cut" value in surface soil samples at NAS Cecil Field.

The significant difference to the September 1997 ROD involves excavating the locations with the highest arsenic concentrations and replacing them with clean fill. This would result in an average arsenic concentration that is less than the background value. Approximately 276 cubic yards of excavated soil would be hauled to an offsite landfill for disposal. After these actions have been completed, no further action would be required at OU4.

Statutory Determinations

The cleanup remedy presented in the ROD for OU4 and amended by this ESD is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective. This remedy utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable for the site.



Scott E. Glass, P.E.
Base Realignment and Closure
Environmental Coordinator

6/28/99

Date



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