

John Stedman - NFA SOB letter wpd

February 27, 2001

4WD/FFB

Commander
Department of the Navy
SOUTHNAACFACENCOM
Attn: Mr. Jim Reed
Mail Code 1872
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: Draft Statement of Basis for Proposed "No Further Action" BRAC SWMU's 1, 3, 4, 6, 8, 10, 11, 16, 18, 21, 26, 27, 31, 36, 40, 42, 44, 50, 52, 53, 60, 62, 64, 66, and 67; Naval Support Activity Mid-South, Millington, Tennessee. April 24, 2000.

Dear Mr. Reed.

The U.S. Environmental Protection Agency has reviewed the subject documents and offer the following comments:

1. Twenty six draft Statement of Basis (SoB) were provided for review. All of the SoB's were reported "No Further Action", however, they all involved some form of land use control. Land Use Control is not considered "no further action" but is considered a form of remedial action.
2. Before choosing a cleanup program, a range of alternatives is typically analyzed to evaluate their advantages and disadvantages for each site involved. An analysis of a range of alternatives has not been provided. Please include a brief analysis or rationale for screening out other alternatives, since a remedy is being selected.
3. There appears to be basically two types of situations described in the SoB's. First is like SWMU 1, where no action is needed to ensure protection of human health and the environment. The second is exemplified by SWMU 3, where action must be taken to ensure such protection. Potential confusion may be created by calling both proposed remedies "no further action with land use controls". Please provide greater distinction between the two scenarios.
4. Certain sites are safe for residential use. Please clarify why the proposed remedy indicates that those sites must be used for non-residential purposes only. Examples of this are

SWMUs 1, 4, 6, 31, 36, 38, 40, 42, 53, 44, 50, 51, 52, 62, and 66, etc.

5. Please explain that the drilling restriction at sites like SWMU 1, where the groundwater is not contaminated, is to prevent lateral migration of contaminated groundwater into an uncontaminated area.
6. The phrase "no ecological risk" or "no environmental risk" is too absolute, even in light of long-term viable habitat. Recommend using the phrases "no significant or unacceptable ecological risk" or "unlikely that there is significant environmental risk". These phrases are a more realistic characterization of risk.
7. While the text states that the "Land use control implementation plans (LUCIPs) prepared by the BCT for property transferred at NSA Mid-South are already in place for the airfield and non-airfield parcels", please note that EPA expects that the proposed remedy as described in the SoB's will be effectively implemented through the permit modification process. The permit modification process should proceed upon approval of the Statement of Basis.
8. SWMU 3. Section 5.0 indicates that there is no significant impact to soil or groundwater while Section 4.0 states that both the cancer and non-cancer risks exceed US EPA's acceptable limits. Please correct Section 5.0 to accurately depict the risk at SWMU 3. Please correct like inconsistencies in other SWMUs.
9. SWMU 8, VOCs, SVOCs and metals exceeded tap water RBCs and USEPA treatment techniques action levels, however, no data was provided. Recommend adding a table which summarizes this information.
10. SWMU 10, Figure 1. Locate SWMU 38 on the figure.
11. SWMU 18. A soil removal action was conducted and based on analytical results no further action is recommended. Recommend adding a brief table which outlines pre-excavation, post excavation levels and clean-up levels. Please correct like in other SWMUS involving removal actions.
12. SWMU 21, Page 4, Section 5.0: a soil removal action was conducted, groundwater contamination will be addressed under Area of Concern A, and risk assessments indicate conditions are protective of human health and the environment. Please indicate if both soil and groundwater risks are protective or if only the soil. There is a general lack of clarity in the risk associated with the respective sites reflected in most of the SoBs.
13. SWMU 27. Due to the recent discovery of drums located at this SWMU, it is inappropriate to consider "no further action" until the drum removal action has been completed and sampling has shown there is no contamination above industrial levels.
14. For all SoBs, please include a general basewide figure that shows the SWMU location.

Thank you for the opportunity to review the draft Statements of Basis. If you have any questions please contact me at 404/562-8539.

Sincerely,

Deborah A. Vaughn-Wright
Remedial Project Manager

cc: Rob Williamson, NSA Mid-South
Jim Morrison, TDEC
Clayton Bullington, TDEC
Jack Carmichael, USGS
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