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NAS CECIL FIELD, FL  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON DRAFT ACTION MEMORANDUM FOR OPERABLE UNIT 5 (OU 5) SITE 49  
FORMER SKEET RANGE NAS CECIL FIELD FL  
4/19/2002  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

April 19, 2002

Commanding Officer  
Mr. Mark Davidson, Code ES339  
SOUTHNAVFACENGCOM  
Post Office Box 190010  
North Charleston, SC 29419-9010

RE: Draft Action Memorandum for Operable Unit 5, Site 49 -  
Former Skeet Range, Naval Air Station Cecil Field, Florida.

Dear Mr. Davidson:

I have completed my review of the Draft Action Memorandum for Operable Unit 5, Site 49 - Former Skeet Range, Naval Air Station Cecil Field, dated March 2002 (received March 18, 2002), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments that should be addressed in the final report:

- (1) In Section 2.4 of the Action Memorandum, it is stated that the "removal action at OU 5, Site 49 has been identified as a non time-critical removal action." I cannot reconcile this with the statement in Section 3.0 that "Actual or threatened releases of contaminants at Site 49, if not addressed by implementing the response action selection in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment." It would seem that if contamination present at the site poses an imminent threat, it would have to be identified as a time-critical removal action.
- (2) The proposed action for soil removal described in Section 4.1 needs rewording. The removal action described says that 5,681 cubic yards of soil that exceeds the established statistical pickup value to achieve three times the FDEP Soil Cleanup Target Levels for residential direct exposure or leachability to groundwater will be excavated. In actuality, the removal action will remove soils contaminated with lead or PAHs at levels that exceed three times the FDEP SCTLs for residential direct exposure. This removal will remediate soils in order to achieve levels protective for residential use based upon an exposure to ½ acre exposure units. The basis for the proposed action is much better explained in Appendix A, the Removal Design Package.

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- (3) The proposed action also states that areas of soil with significant amounts of visible lead pellets will be excavated. "Significant" is not a quantitative term and as such, is open to various interpretation by interested parties. Please provide some measurable criteria by which it can be determined that cleanup of those areas containing visible lead pellets has been achieved.
- (4) Section 5.0 of the Action Memorandum has the BCT agreeing that soils exceeding the lesser of the residential SCTLs or the leachability to groundwater criteria for BaP and the Inorganic Background Data Set value for lead being excavated and disposed off-site to achieve the residential land use scenario. As stated above, according to past BCT agreements and the Removal Design Package, the criteria for removing lead and PAH contaminated soil is that all soils exceeding three times the residential SCTLs or leachability criteria would be removed.
- (5) While Figure E-1 of the Design Package adequately describes the areas to be excavated and the contaminant concentration detected within the various areas to be excavated, there isn't a figure showing the contaminant concentrations that will be left after the removal has been complete. I feel a figure showing what levels of contamination are to be left and where these contaminants were detected would be invaluable for any future site user to have as well as for anyone evaluating the proposed action being described.

If you have any concerns regarding this letter, please contact me at (850)921-9991.

Sincerely,  
  
David P. Grabka, P.G.  
Remedial Project Manager

- CC: Satish Kastury, FDEPA  
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TJB  JJC  <sup>for</sup> ESN 