

N60200.AR.003542  
NAS CECIL FIELD, FL  
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON DRAFT LAND USE CONTROLS REMEDIAL DESIGN FOR OPERABLE UNIT  
11 (OU 11) SITE 45 NAS CECIL FIELD FL  
*2/7/2003*  
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

February 7, 2003

Mrs. Debbie Vaughn-Wright  
Remedial Project Manager  
United States Environmental Protection Agency  
Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

RE: Land Use Control Remedial Design, Site 45, Naval Air Station  
Cecil Field

Dear Mr. Davidson:

The Department has completed its review of the Land Use Control Remedial Design, Site 45, Naval Air Station Cecil Field, dated January 24, 2003 (received via e-mail January 24, 2003), prepared by Debbie Vaughn-Wright, EPA Region 4, and Scott Glass, Southern Division Naval Facilities Engineering Command. The Department has the following comments on the Land Use Control Remedial Design:

- (1) Section 3.a.ii. Replace Industrial with Residential.
- (2) There is some confusion with paragraphs 4.c., 4.d. and 4.i.iii. The confusion stems from the discussion of specified inspection and monitoring frequency, annual monitoring report, LUC monitoring report and LUC monitoring. Because groundwater monitoring is a component of the selected remedy for this site, there could be some confusing because of the term "monitoring" used instead of the term "inspection". I believe this may be resolved as follows:
  - (a) Section 4.c. Remove "and monitoring" from the title so that it reads "**Specified LUC inspection frequency (include risk discussion)**".
  - (b) Section 4.d. In the text after the title, replace "annual monitoring report" and "LUC monitoring report" with "annual LUC inspection report".
  - (c) Section 4.h. In the title, replace "LUC monitoring" with "LUC inspections".
  - (d) Section 4.i. Same comment as (2)(c).

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

Mrs. Debbie Vaughn-Wright  
Page Two  
February 7, 2003

- (e) Section 4.i.iii. Replace "annual reporting" with "annual LUC inspection reporting".
- (3) There is also some confusion stemming from the fact that the LUC Remedial Design states that LUC inspections must be performed every five years while LUC inspection reporting will be annual. I believe this can be clarified by explaining that the annual LUC inspection report will cover all NAS Cecil Field sites requiring land use controls and that Site 45 is but one site on a list of sites that will require LUC inspection reporting.
- (4) Section 4.c., second sentence. Please rewrite this sentence to read "The inspections would occur at a frequency such that exposure to on-site contamination over the period of time between inspections should not result in an unacceptable risk to a residential receptor."

If you have any concerns regarding this letter, please contact me at (850)245-8997.

Sincerely,

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

CC: Scott Glass, Southern Division

TJB \_\_\_ JJC \_\_\_ ESN \_\_\_