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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT AND REVISED DRAFT RECORD OF DECISION FOR OPERABLE
UNIT 11 (OU 11) SITE 45 NAS CECIL FIELD FL
2/27/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

February 27, 2003
OFFICIAL CORRESPONDENCE

Commanding Officer
attn: Mr. Mark Davidson, Code ES339
Southern Division
Naval Facilities Engineering Command
Post Office Box 190010
North Charleston, SC 29419-9010

Dear Mr. Davidson:

I have completed my review of the two revisions of the Draft Record of Decision for Site 45, Naval Air Station Cecil Field. One version contained revisions to the Draft ROD that were written by Martha Brock, EPA Region 4. The other version contained revisions written by Steve Beverly, Southern Division Naval Facilities Engineering Command. Based upon the revisions to the document in the two versions of the Draft ROD, I have the following comments:

- (1) In Section 1.2, please remove the statement that the State of Florida agrees with the Selected Remedy. Final approval of the selected remedy by the Department has not occurred as yet.
- (2) In Section 2.10.2, Component 1: Land Use Controls, second bullet, please replace "Industrial" with "Residential".
- (3) In discussions during our Cecil Field partnering meeting (February 19-20, 2003), we discussed how to allow for particular work related to excavation and removal of soils and extraction of groundwater that could be proposed by future owners of the site. The following paragraph was extracted from a recent Finding of Suitability to Transfer for two sites at the Orlando Naval Training Center.

Groundwater Related Restrictions: The installation of any wells or the extraction or use of groundwater for any purpose is prohibited on the Subject Property without prior written authorization from the Navy and FDEP. These restrictions are established to prevent exposure to contaminated groundwater and preclude horizontal or vertical migration of contaminated groundwater. FDEP will grant authorization for construction related groundwater dewatering, if the groundwater dewatering is conducted in accordance with applicable State regulations; appropriate precautions are taken for handling/disposal of potentially contaminated groundwater; migration of the groundwater plume is prevented; and human health and the environment is protected.

I believe the above paragraph could be reworded and expounded upon to also allow potential soil excavations and removals by future property owners with prior written authorization by the Navy and the regulatory agencies. This type of language, if incorporated within the ROD and LUC Remedial Design, would allow future owners of the property greater flexibility in redeveloping and managing the site. I believe this would also resolve some of the issues/comments raised by Steve Beverly.

- (4) Concerning Section 2.10.2, Component 3: Contingency Remedy, Steve Beverly's revision, I prefer Steve's language for the first paragraph. However, some of Martha's revision language is more acceptable in the second paragraph. I would propose the following rewrite:

In addition to the aforementioned, due to the lengthy projected time frame for reaching clean-up goals for vanadium in groundwater (900-1300 years), periodic reviews of new technologies which may address vanadium in groundwater shall be conducted. Such reviews could be conducted as part of any required Five-Year Review in the event that either EPA, FDEP or the Navy becomes aware of any such technology(ies). Should the aforementioned parties agree that a particular new technology(ies) shows potential for significantly reducing the remediation time for vanadium in groundwater, then the parties shall evaluate, taking into consideration the predicted costs of implementing the technology(ies), whether the Navy should proceed to undertake a focused feasibility study to evaluate the practicality of implementing such a new developed remedial technology(ies).

This electronic message is being sent in lieu of regular mail. If you have any questions concerning this review, please contact me at (850)245-8997.

Sincerely,

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