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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT PROPOSED PLAN FOR OPERABLE UNIT 9 (OU 9) SITE 57 AND
SITE 58 NAS CECIL FIELD FL

3/24/2003

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

March 24, 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 Draft Proposed Plan for Sites 57 and 58, Naval Air Station Cecil Field, dated October 2002 (received October 7, 2002). Please excuse the late response with comments on this document. I have the following comments on the Draft Proposed Plan:

- (1) In the Proposed Plan, the proposed remedy to address soil contamination detected at Site 58 is excavation and disposal. There has been discussion between the BRAC Cleanup Team members as to whether this soil contamination will be addressed under the Installation Restoration Program or the Petroleum Program. Past discussions left me with the impression that the soil contamination detected at Site 58, PAH contamination in the ditch, would be addressed under the Petroleum Program. If this is so, the document needs substantial rewriting to remove references to the soil remedial alternative, excavation and disposal. If the soil excavation and disposal is to remain part of the Installation Restoration Program remedy for Site 58, please disregard this comment.
- (2) On page 5, Section titled **Summary of Site Risks**, section paragraph, please add that the PRE indicated adverse human health effects at Site 58 due to concentrations of VOCs, PAHs and TRPH greater than FDEP GCTLs in groundwater. The end of the paragraph only notes PAHs and TRPH concentrations at Site 58.
- (3) On page 6, in the Section titled **What are the Cleanup Objectives and Levels?**, please revise the bullets listing the Remedial Action Objectives to correspond to the verbiage that has been agreed to for the Site 45 Record of Decision.
- (4) On page 7, in the section concerning Groundwater Alternative 3, In-Situ Treatment, please fix the copyright symbol associated with HRC and ORC. The copyright symbol © is mistakenly shown as an â.
- (5) On page 8, in the Section titled **Detailed Analysis of Cleanup Alternatives**, first paragraph, the first sentence should be "In accordance ~~to~~ with CERCLA, a detailed analysis of each cleanup alternative must be performed by using nine evaluation criteria."
- (6) On page 8, in the Section titled **A Closer Look at the BCT's Proposed Cleanup Plan**, part 2, Institutional Controls, there should be a short statement that a Land Use Control Remedial Design will be developed specifying the actions to be taken implementing the Land Use Controls.

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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