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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 12 (OU 12) SITE 32 NAS
CECIL FIELD FL
7/3/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

July 3, 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 Operable Unit 12, Site 32, NAS Cecil Field, dated June 2003 (received June 16, 2003). The proposed remedy is the implementation of land use controls, engineering controls and monitoring of groundwater, surface soil and subsurface soil. Land use controls would be implemented to prevent residential development of the site. Engineering controls would be implemented to ensure the maintenance of the asphalt pavement that overlies contaminated soil. Monitoring of groundwater, surface soil and subsurface soil would be conducted to verify that contaminant migration is not occurring. The proposed remedy for Site 32 appears acceptable to the Department. I have the following comment that should be addressed in the final document:

On page 7, in the section describing Alternative 3: Excavation and Off-Base Treatment and Disposal, the remedial alternative states that excavated soil and crushed pavement would be transported to an off-base treatment, storage and disposal facility (TSDF), where the exact nature and extent of treatment would be determined by the TSDF based upon actual analysis of the contaminated materials and the requirements of the TSDF permit. In my experience, TSDFs are facilities that manage, treat or dispose of hazardous wastes. Manifesting and transporting the crushed pavement and excavated soil to a TSDF would appear cost prohibitive and most likely unnecessary. I would suggest that the Navy handle this dig and haul alternative to the selected remedy as it has handled other dig and hauls at other sites, allowing the Navy contractor to characterize waste materials as hazardous or non-hazardous wastes prior to the wastes being transported off-site.

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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