

N60200.AR.003731  
NAS CECIL FIELD, FL  
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON DRAFT RECORD OF DECISION FOR OPERABLE UNIT 10 (OU 10) SITE 25  
FORMER TRANSFORMER STORAGE YARD NAS CECIL FIELD FL  
10/7/2003  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

October 7, 2003  
OFFICIAL CORRESPONDENCE

Commanding Officer  
attn: Mr. Mark Davidson, Code ES33  
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 Record of Decision (ROD) for Operable Unit 10, Site 25, Former Transformer Storage Yard, Naval Air Station Cecil Field, dated May 2003 (received May 30, 2003), prepared and submitted by Tetra Tech NUS, Inc. My review of the report was conducted taking into consideration U.S. EPA comments and EPA's rewrite of the original August 2001 Draft ROD for this site. I also took into consideration the Draft ROD for Site 45 that is currently undergoing final revisions prior to finalization. I have the following comments on the Draft ROD:

- (1) On page 1-1, Section 1.4, the first mention of benzene hexachloride (BHC) as a Contaminant of Concern (COC) for groundwater is made. Benzene hexachloride, otherwise known as hexachlorobenzene, is not a COC at this site. Rather, the isomers of hexachlorocyclohexane (HCH) have been detected in groundwater at this site above GCTLs and are COCs. Benzene hexachloride has a different Chemical Abstracts Service Registry Number (CAS#) from the various isomers of hexachlorocyclohexane and they have different groundwater cleanup target levels as well. The report needs to make it abundantly clear which contaminants are present in groundwater at the site and are presenting potential risks to future users of the property. This confusion needs to be cleared up throughout the report. I would also suggest providing the CAS# for each particular COC at the earliest mention of the particular contaminants within the report.
- (2) On page 1-2, second bullet, please remove reference to preventing residential development of Site 45.
- (3) On page 1-2, last paragraph of Section 1.4, please revise this paragraph to that recently agreed upon between the Navy, EPA and the Department.
- (4) On page 1-2, Section 1.5, second paragraph, please revise the sentence to read "The nature of the selected remedy for OU 10, Site 25 is such that ARARs will be met through natural attenuation of HCH in groundwater."
- (5) On page 2-6, Section 2.4, please add a bullet for the following Remedial Action Objective. Reduce concentrations of isomers of HCH in groundwater to less than the FDEP GCTLs. This RAO should be added to remain consistent with what is contained in the Draft Site 45 ROD.
- (6) On page 2-11, Section 2.5.3, please add at the end of the paragraph the following two sentences. "The site remedial action objectives support residential risk exposure. However, due to groundwater contamination, restrictions on groundwater usage are required until clean-up levels are achieved."
- (7) Section 2.6.1 needs to be rewritten to more accurately reflect Human Health Risks at Site 21. Preliminary Risk Evaluation for PRE should be spelled out in the first paragraph. It

should be mentioned in this section that concentrations of alpha and beta HCH were detected in groundwater above FDEP's GCTLs, reflecting carcinogenic risks from consumption of groundwater above  $1 \times 10^{-6}$ . Risks from consumption of groundwater were not above the EPA's risk range of  $1 \times 10^{-4}$  to  $1 \times 10^{-6}$ . Also, a paragraph almost identical to that in the Draft Site 45 ROD should be added at the end of the section. That paragraph should read:

"The PRE is a screening-level evaluation of potential risks from site constituents to human receptors at the site. The risks calculated in the PRE are derived by a comparison of exposure concentrations to GCTLs or PRGs. These GCTLs and PRGs are derived using default exposure assumptions established by the FDEP and U.S. EPA, respectively. Because there are no deviations between the Navy and the regulatory agencies regarding those exposure assumptions or pathways defined by the regulatory agencies for groundwater exposure, this approach was used to streamline the evaluation of risk."

- (8) On page 2-12, Section 2.8, second paragraph, please add this sentence to the end of the paragraph. "The alternatives evaluated, as described in the FS and summarized in Table 2-4, are as follows:
- (9) On page 2-15, Section 2.10.1, please add other considerations on which the selected remedy was based. These include: that the groundwater contaminant plume is small and stable and confined to the surficial aquifer, and that there is no evidence of ongoing contaminant migration.

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,

David P. Grabka, P.G.  
Remedial Project Manager  
MS4535  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
Office: 850.245.8907  
Direct: 850.245.8997  
FAX: 850.245.8703  
david.grabka@dep.state.fl.us