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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT RECORD OF DECISION FOR OPERABLE UNIT 12 (OU 12) SITE 32
NAS CECIL FIELD FL
10/17/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

October 17, 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 12, Site 32, DRMO Asphalt Storage Yard, Naval Air Station Cecil Field, dated August 2003 (received September 2, 2003), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Draft ROD:

- (1) One of the major components of the selected remedy is the use of an existing asphalt cap as an engineering control to prevent exposure to contamination located beneath the asphalt and to inhibit the leaching of contaminants to groundwater. This needs to be stated explicitly in the document. Currently, only maintenance of that asphalt cap is mentioned as a component of the selected remedy. The ROD should also state that this engineering control will be certified by a Professional Engineer. I have attached a copy of a Professional Engineering certification of an engineering control for another site to this letter as an example. The engineering certification would be attached to the LUC Remedial Design.
- (2) I concur with EPA's comment that a Land Use Control prohibiting excavation of the asphalt cover or soils beneath the cover without prior written consent by the Navy, EPA and FDEP should be added as a component of the selected remedy.
- (3) In Section 1.4, page 1-2, last paragraph, please change this paragraph so it reflects what has been recently negotiated between the Navy, DoD and EPA.
- (4) On page 2-7, Section 2.6.1, second paragraph, last sentence, please insert the word "reasonably" between the words "is" and "ensured."
- (5) On page 2-8, Section 2.6.1, paragraph at the top of the page, second to last sentence, it says that post-IRA concentrations of benzo(a)pyrene and benzo(a)pyrene equivalents were less than the industrial SCTL for BaP and correspond to a post-IRA risk of 7.6×10^{-7} . This post-IRA risk should be identified as a carcinogenic risk and the number should be associated with a particular receptor, for example a site worker or a child or adult resident.
- (6) On page 2-8, Section 2.6.1, paragraph at the top of the page, last sentence, please insert the words "an unacceptable" between the words "represents" and "human health risk".
- (7) In Section 2.6.1, there should be some discussion concerning FDEP's allowance of carcinogenic risk of 1×10^{-6} .
- (8) On page 2-8, Section 2.6.1, last paragraph, last sentence, please remove "by the property owner" from the sentence.

- (9) On page 2-15, top of the page, please add "and leachability" between the words "residential" and "SCTLs".

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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Remedial Project Manager
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**Professional Engineers Certification
for Terminix Boynton Beach Property**

Any chlorinated pesticide contaminated soil remaining on the former Terminix facility property located at 1304 N. Federal Highway in Boynton Beach, Florida, underneath the on-site building is adequately covered and isolated to eliminate any threat to human health or the environment. I have performed a site inspection of the building to determine the condition of the building and the suitability of the building to provide the restrictions set forth within the Declaration of Restrictive Covenant for this property. The building, inclusive of its roof and building slab, provides a protective cover and barrier which is sufficient and adequate to eliminate direct exposure or threat to human health or the environment which may exist in connection with the presence of chlorinated pesticide contaminated soil remaining underneath the building. My non-invasive inspection of the building further indicated that the roof appeared to be in good condition, and the building floors and slab are in good condition with no apparent cracks, crevices or breaches which would provide an exposure pathway to chlorinated pesticide contaminated soil which may exist underneath the building.

I have prepared and approved of the above response for the property located at 1304 N. Federal Highway in Boynton Beach, Florida, and seal it in accordance with Chapter 471 of the Florida Statutes. Furthermore, this seal is contingent upon the complete execution and recording of the Declaration of Restrictive Covenant for the property. In sealing this response, I certify that the engineering and/or pertinent information contained is true to the best of my knowledge and the engineering controls are consistent with commonly accepted engineering practices.

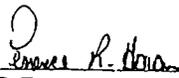

Terrence R. Horan, P.E. 3/18/03
Florida License No.: 54815

EXHIBIT A