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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON DRAFT RECORD OF DECISION FOR OPERABLE UNIT 9 (OU 9) SITE 57 AND SITE 58 NAS CECIL FIELD FL
10/21/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

October 21, 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 9, Sites 57 and 58, Naval Air Station Cecil Field, dated October 2002 (received October 14, 2002), as revised by Debbie Vaughn-Wright of the U.S. EPA Region 4 on September 3, 2003. I have generally accepted the revisions to the document made by Debbie, but have the following additional comments on the Draft ROD:

(1) On page 1-3, first bullet, please change the word "timberline" that Debbie inserted to "timeline".

(2) 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.

(3) In Section 2.1, second paragraph, please change Debbie's wording of "the FDEP Petroleum Contaminated Site regulation" to "Chapter 62-770, Florida Administrative Code (FAC), Florida Petroleum Contamination Cleanup Criteria rule".

(4) On page 2-9, Section 2.4, I concur with Debbie that the first bullet may be removed as contaminated soil will be addressed under Florida's Petroleum Cleanup rule.

(5) On page 2-6, Section 2.4, please add a bullet for the following Remedial Action Objective. Reduce concentrations of contaminants in groundwater to less than the FDEP GCTLs and Federal MCLs. This RAO should be added to remain consistent with what is contained in the Draft Site 45 ROD.

(6) 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 contaminants were detected in groundwater above FDEP's GCTLs, reflecting carcinogenic risks from consumption of groundwater above 1 x 10-6 and non-carcinogenic risks from consumption of groundwater totaling to a Hazard Index greater than 1. 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."

(7) I concur with the EPA that Section 2.7.1 may be deleted.

(8) In Section 2.8.2.2, first paragraph, fourth sentence, please add “past those sentinel wells” at the end of the sentence.

(9) In Section 2.10.1, third bullet, I do not believe we can state that there is no evidence of ongoing migration of the contaminant plumes. I believe that we might be able to say that the groundwater contaminant plumes that have been identified are not expected to migrate very rapidly (insert calculated groundwater velocity and contaminant velocities) and those contaminants may reasonably be expected to have degraded to below GCTLs and Federal MCLs before migrating past sentinel monitoring wells. Additionally, free product and contaminated soil removals conducted at Day Tank 1 under Chapter 62-770, F.A.C., may be expected to remove the source of the petroleum portion of the Site 57 plume. Another rationale that could be added to this section is that groundwater is not currently being extracted, humans and the environment are not currently exposed to groundwater contaminants, and the selected remedy ensures that exposure to the groundwater contaminants will be prevented in the future unless otherwise allowed by the Navy, EPA and FDEP.

(10) In Section 2.10.2.4, second paragraph, last sentence inserted by Debbie, please add “sampling frequency” to those activities or things that may change over time dependent upon sample results and with approval by the Navy, EPA and FDEP.

(11) In Section 2.10.2.4, fourth paragraph, last sentence inserted by Debbie, please add “sampling frequency” to those activities or things that may change over time dependent upon sample results and with approval by the Navy, EPA and FDEP.

(12) In Section 2.11.1, first paragraph, third sentence inserted by Debbie, it says “Subsequently, the reduced frequency of exposure results in a reduced intake of constituents of concern and consequently, a reduce risk.” This sentence is misleading in that it infers we are somehow reducing the frequency of exposure. In actuality, exposure is not concurrently occurring and our selected remedy ensures that that remains the case.

(13) Table 2-6 may be deleted as it refers only to soil contamination not being addressed in this ROD.

(14) In Table 2-9, F.A.C. Chapter 62-520 is listed as being the citation for both groundwater and drinking water criteria. Please correct.

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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