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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 10 (OU 10) SITE 21
NAS CECIL FIELD FL
2/9/2005
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

February 9, 2005
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 reviewed the Draft Record of Decision for Operable Unit 10, Site 21, Naval Air Station Cecil Field, received by e-mail January 13, 2005, prepared and submitted by TetraTech NUS, Inc. The Draft Record of Decision accurately describes the proposed remedy of (1) land use controls to prohibit residential use of the property and prohibit use of the surficial aquifer until cleanup goals have been met and (2) groundwater monitoring to evaluate decreases in contaminant concentrations and verify contamination is not migrating past selected compliance wells. However, I have the following comments on the document:

(1) On page 2-7, Section 2.5.2.1, first paragraph, second sentence, please change "alpha-, beta-, and gamma-benzene hexachloride (BHC)" to "alpha-, beta-, and gamma-hexachlorocyclohexane (BHC)."

(2) On page 2-8, Section 2.5.2.2, first paragraph, please explain in a little more detail why manganese was removed as a chemical of potential concern (COPC). From the document, it says that manganese was detected at two locations at concentrations slightly in excess of twice the base's Independent Background Data Set (IBDS) value. The only rationale for dropping it as a COPC is that manganese was not used at Site 21. The metal manganese is rarely used by itself; it is most often a component in some product. Please verify that the various compounds used at the Site 21 Golf Course Maintenance Area did not have appreciable quantities of manganese in their formulation.

(3) On page 2-9, Section 2.6.1, first paragraph, second sentence, please indicate that the risk calculated, EPA's target risk range and FDEP's target risk being discussed are for carcinogenic risk. I have the same comment on page 2-11, Section 2.8.1.2, second paragraph, second sentence.

(4) On page 2-17, Section 2.10.2.4, Contingency Remedy, first sentence, please remove the reference to the Five-Year Review. The Department cannot agree that a change in the selected remedy be contingent upon the Five-Year Review. This would allow a delayed response to an indication that site conditions had changed and warranted a more aggressive remedial action to be undertaken.

(5) On page 2-17, Section 2.10.3, I could not reconcile the summary of estimated remedy costs with the costs stated at the ends of Sections 2.8.1.2 and 2.8.2.2, which state the costs of the individual components of the remedy. Please check the math to make sure that it is 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,

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