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NAS CECIL FIELD, FL  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON DRAFT SECOND FIVE YEAR REVIEW NAS CECIL FIELD FL  
9/9/2005  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

September 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 completed my review of the Draft Second Five-Year Review for Naval Air Station Cecil Field, dated June 2005 (received June 17, 2005). I have the following comments on the Draft Five-Year Review:

- (1) On page 1-6, Section 1.4, please note that Chapter 62-550, Florida Administrative Code, was amended in 2003. The amended rule changed the arsenic primary groundwater standard from 50 µg/L to 10 µg/L, effective on January 1, 2005.
- (2) On page 2-6, top paragraph, last sentence, please remove the word "a". On the same page, in the section on Sediment Sampling, second paragraph, last sentence, please make the same change.
- (3) On page 2-7, in the section on the Landfill Gas Survey, it says that the LEL was less than 10 percent at 31 of the 35 sampling locations. Later in that same paragraph it says that the LEL was less than 100 percent at all sample locations. I believe these are incorrect statements. I believe that what is meant to be conveyed is that landfill gas concentrations were less than 10 percent of the LEL at 31 of the 35 sampling locations and that the landfill gas concentrations were less than 100 percent of the LEL at all sample locations.
- (4) On page 2-9, Section 2.6.1, last paragraph, second sentence, same comment as in (3) above.
- (5) On page 2-9, in the section on Surface Water Sampling, second bullet, please change gamma-benzene hexachloride (BHC) to gamma-hexachlorocyclohexane (BHC).
- (6) On page 4-9, Section 4.6.1, near the bottom of the page, it says that LUCs are required for soils at Site 8. It says earlier and later in the report that remediation of soils to be protective for unrestricted use was conducted. Therefore, there should be no need for LUCs for soils at Site 8.
- (7) On page 5-2, top of the page, in the section on Initial Response and Basis for Taking Action, last part of the paragraph, it says that hazardous constituents were detected in Site 10 groundwater samples at concentrations in excess of criteria. This is the last mention of groundwater in the discussion of Site 10. Please determine how and if groundwater was addressed.
- (8) On page 5-5, Section 5.7.2.2, last sentence, please add the word "is" between "remedy" and "complete".
- (9) On page 7-2, Section 7.3, in the subsection on Initial Response and Basis for Taking Action, last sentence, it says that hazardous constituents were detected in groundwater and sediment at Site 16. I believe it should be soil rather than sediment.

- (10) On page 7-5, Section 7.4.2.5, second bullet, please change “of” to “or”.
- (11) On page 7-12, second to last sentence on the page, it says that the TCE concentration has not become more stringent since the signing of the Interim and Amended RODs. I believe what it is meant to say is that the TCE GCTL or cleanup goal has not become more stringent.
- (12) On page 8-4, Section 8.4.3.1, please change AS/VE System to AS System.
- (13) On page 9-1, Section 9.1, first sentence, please remove the word “the”.
- (14) On page 9-3, second sentence from the top of the page, please change “This area was remediated under the FDEP Petroleum Program” to “This area is being remediated under the FDEP Petroleum Program.”
- (15) On page 9-16, first paragraph, second to last sentence, it says that concentrations of manganese increased significantly in May 2004. Please provide a little more detail on this.
- (16) On page 9-20, Section 9.7.3, second sentence, please replace the word “of” with the word “the”.
- (17) On page 9-21, in the box, please add that the continued operation of the Air Sparging System is a Recommendation/Required Actions.
- (18) On page 10-2, Section 10.3, in the subsection on Initial Response and Basis for Taking Action, second sentence, it says that Facility 11 was identified in the EBS as requiring further action. But the EBS is not listed in the site chronology. Also, in the same subsection, please give dates for when the site was redesignated as a PSC and when it was further redesignated as Site 45.
- (19) On page 10-4, top of the page, second bullet, same comment as (10).
- (20) On page 10-7, Section 10.6.3, same comment as (16).

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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