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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT REMEDIAL
INVESTIGATION FOR MUNITIONS RESPONSE AT OPERABLE UNIT (OU 5) SITE 15 NAS
CECIL FIELD FL
4/6/2012
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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April 6, 2012

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Attn: Mr. Art Sanford
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

RE: Draft Feasibility Study for Munitions Removal at Operable Unit 5, Site 15 – Blue 10 Ordnance Disposal Area, Naval Air Station Cecil Field, Jacksonville, Florida.

Dear Mr. Sanford:

The Department has completed its review of the Draft Feasibility Study for Munitions Removal at Operable Unit 5, Site 15 – Blue 10 Ordnance Disposal Area, Naval Air Station Cecil Field, dated November 2011 (received December 1, 2011) and Revision 01 of the Feasibility Study dated February 2012 (received by e-mail on February 20, 2012), prepared and submitted by Tetra Tech NUS, Inc. Based on the Department's reading of EPA Region 4's comments on the draft Feasibility Study, the Department has the following comments on the document:

- (1) In Section 3.2.4.3, it discusses the use of armored excavation equipment to excavate soil, loading of the soil onto either conveyors or transport trucks to move to the processing area, processing the soil through a series of screening devices and conveyors to produce segregated soils of different grain sizes, and once processed, returning the soil to its original location. As the Department interprets EPA's comments, the response action being discussed would trigger RCRA Land Disposal Restrictions (LDRs) if the soil that is processed would test as characteristically hazardous (e.g., exhibits toxicity characteristic due to lead). Therefore, soils that were processed in such a manner and that are characteristically hazardous could not be returned to the site for placement; rather, they would need to be properly disposed. The soils that are characteristically hazardous could be hauled off as hazardous waste and transported to a permitted RCRA Treatment, Storage or Disposal facility or treatment at the site could be conducted rendering the soils non-hazardous such that they meet soil LDR treatment standards and may be disposed at a Subtitle D landfill.

Treatment of hazardous soils rendering the soils non-hazardous and off-site disposal would equate to the work CH2M Hill Constructors, Inc., did as part of the previous remediation conducted at Site 15.

- (2) In Section 3.2.4.2, it discusses the manual excavation and removal of shallow subsurface anomalies. As the Department understands what is proposed in this section, the activity proposed would not trigger RCRA LDRs for soils that were excavated using hand tools and essentially processed in place.
- (3) In Section 3.2.5.3, please remove the option of reusing soil on site that has been excavated, that would be characteristically hazardous at the time of excavation and that has been treated to meet either the Universal Treatment Standard or the alternative LDR treatment standard for lead. This soil would still need to be used off-site as a recycled product or disposed in an appropriate landfill. Reuse of hazardous soils rendered non-hazardous by treatment cannot be on site. Please see Section 3.2.6.2.
- (4) In Section 3.2.6.3, On-Site Beneficial Reuse, it suggests that characteristically hazardous soils treated to render them non-hazardous could be left on site and backfilled into excavations, depending on the **treatment**. Please see my first comment. On-site beneficial reuse as described would only be allowed for soils that are not characteristically hazardous at the time they were excavated.
- (5) Section 4.2.2 discusses remedial alternatives 2A, 2B and 2C. The seventh point in subsection 4.2.2.1 discusses manual removal as discussed in Section 3.2.4.2 and in my second comment above. The tenth point in that section discusses shielded mechanical excavation and sifting as discussed in Section 3.2.4.3 and in my first comment above. The twelfth point discusses the differences between remedial alternatives 2A, 2B and 2C. Alternative 2A would be allowed. Alternative 2B could not be allowed as it suggests that hazardous soil rendered non-hazardous could be reused as backfill at the site (see my comments (3) and (4) above). Alternative 2C would only be allowed if only manual excavation as described in Section 3.2.4.2 were to take place; the designation of the site as an AOC appears to me to be irrelevant when determining if LDRs are triggered.
- (6) Section 4.2.3 discusses remedial alternatives 3A, 3B and 3C. Same comment as in (5) above, just with the points being numbered differently.
- (7) Section 4.2.4 discusses remedial alternatives 4A, 4B and 4C. Same comment as in (5) and (6) above, just with the points being numbered differently.

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- (8) Triple Super Phosphate (TSP) is mistakenly identified as Triple Sugar Phosphate wherever it is mentioned in the document.
- (9) The range of alternatives described in the Feasibility Study appears adequate and does not need amending.

If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Tim Bahr, FDEP
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