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NAS CECIL FIELD
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT PROPOSED PLAN OPERABLE UNIT 2 (OU2) SITES 5
AND 17 WITH ATTACHMENT NAS CECIL FIELD FL
6/26/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

June 26, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding Officer
Mr. Alan Shoultz, Code 1875
SOUTHNAVFACENCOM
Post Office Box 190010
North Charleston, SC 29419-0068

RE: Draft Proposed Plan, Operable Unit 2, Sites 5 and 17,
Naval Air Station Cecil Field Florida.

Dear Mr. Shoultz:

The Department has completed the technical review of the Draft Proposed Plan, dated June 1995 (received June 15, 1995) submitted for the above-referenced facility. Before this document is considered Final, Mr. Brown's and the following comments need to be addressed:

1. Page 6, Table 1, the Ecological Risk column should indicate that there is a risk from soil exposure, and not footnote that there is a risk for one sample.
2. Page 12, Table 2, this table should proceed Figure 7.
3. Page 13, Table 3, this table should be moved to follow Figure 12.
4. Page 22, Section 5.0, what is the estimated cost for groundwater remediation at Site 5?
5. Page 23, the Navy has proposed natural attenuation for the groundwater contamination at Site 17. Detections of VOCs and SVOCs were noted in monitoring wells CEF-17-24S and CEF-17-5S. CEF-17-24S contained methylene chloride detected at 28,000J ppb, phenol at 7,500J ppb, 2-methylphenol at 24,000J ppb, 4-methylphenol at 19,000J ppb, 2,4-dimethylphenol at 9,700J ppb, and naphthalene at 360J ppb. Monitoring well CEF-17-5S contained TCE at 50 ppb, 2-methylphenol at 6,400J ppb, 4-methylphenol at 3,400J ppb, 2,4-dimethylphenol at 1,900J ppb. SVOCs were also detected in monitoring well CEF-17-6S where 2-methylphenol and 2,4-dimethylphenol were

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detected at 660 ppb and 470 ppb, respectively. Methylene chloride, phenol, 2-methylphenol, 4-methylphenol, 2,4-dimethylphenol, naphthalene, and TCE have respective Florida Groundwater Guidance Concentrations of 5 ppb, 350 ppb, 350 ppb, 35 ppb, 6.8 ppb, and 3 ppb. With exceedances of this magnitude, natural attenuation is not an appropriate preferred alternative for groundwater contamination at Site 17. In the future, a Proposed Plan should not be submitted with a proposed preferred alternative that the NAS Cecil Field partnering team has not discussed in detail and the entire team has concurred.

If you have any concerns regarding this letter, please contact me at (904) 921-9991.

Sincerely,



Michael J. Deliz, P.G.
Remedial Project Manager

CC: John Mitchell, FDEP Natural Resource Trustee
Satish Kastury, FDEP
Ashwin Patel, FDEP Northeast District
Bart Reedy, USEPA - Atlanta
Jerry Young, City of Jacksonville
Steve Wilson, SOUTHNAVFACENGCOM
Rao Angara, ABB-ES

TJB ^{JRC}
~~for~~ JCC ^{JRC} ESN ^{ESN}
TJB

Memorandum

Florida Department of Environmental Protection

TO: Mike Deliz, P.G., Remedial Project Manager,
Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section

FROM: Greg Brown, P.E., Professional Engineer II,
Technical Review Section

DATE: June 22, 1995

SUBJECT: Draft Proposed Plan for Remedial Action at OU2, Site
5 and Site 17, NAS Cecil Field, Jacksonville,
Florida.

JRC.
for T.B.

AB

I reviewed the subject document dated June 1995 (received June 19, 1995). I have the following comments:

1. The Proposed Plan should describe for the public how the "ongoing" Interim Remedial Actions relate to the proposed final solutions at these sites. This could be easily accomplished by presenting the vital statistics (including costs) for the selected interim remedies presented in Tables 2 of the Site 5 and Site 17 Proposed Plans for IRAs (dated August 1994).
2. Section 2.0, page 3: "Depending on the success of these plans, future use of OU 2 would remain undeveloped for recreation".

Temporary land-use restrictions, particularly relating to groundwater use, should be part of the proposed plan until risks to human health and the environment are reduced to acceptable levels.

3. Section 2.0, Baseline Risk Assessment, page 7. The last paragraph of this section explains why apparent risks due to inorganic contaminants in groundwater are not considered in this proposed plan. It would be prudent of the Navy to collect the proposed groundwater samples soon so as to finally resolve this issue.
4. Section 2.0, Feasibility Study, page 7. The Department has not seen, reviewed, or approved the June 1995 version of the FS. It is premature to present a proposed plan to the public before regulatory approval of planning documents are obtained.
5. Alternative GW-6 proposes use of an "in-situ Air Stripping Well". This was not described as an alternative in the

MEMORANDUM

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earlier FS dated December 1994. This is an innovative technology that offers potentially significant advantages for site remediation. It's success, however, is dependent on having a good understanding of site-specific conditions. I am not sure if there is enough data to confidently specify this technology at this site with the certainty that it will be both effective and protective. I suggest that additional site-specific hydrologic studies be conducted, particularly a pumping test, before committing to this technology wholeheartedly.

6. The Proposed Plan makes geologic and engineering representations that the public will use to assess the acceptability of the recommended remedial actions. Public confidence in the recommendations would be enhanced if the Navy's responsible professionals provide signed and sealed signature pages in the Proposed Plan. This would indicate that appropriate duty of care and professional standards were applied during formulation of the Proposed Plan's conclusions and recommendations, and this could improve their credibility in the public's view. This precedence has been made at NAS Pensacola where the Navy's responsible professionals provided signature pages in a recent proposed plan.