

N60200.AR.008902
NAS CECIL FIELD
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL PROPOSED PLAN OPERABLE UNIT 2 (OU2) SITES 5
AND 17 WITH ATTACHMENT NAS CECIL FIELD FL
8/17/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of
Environmental Protection

4.2.5
FILE

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

Virginia B. Wetherell
Secretary

August 17, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

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

Dear Mr. Shoultz:

Mr. Greg Brown, P.E., and I have completed the technical review of the Final Proposed Plan, dated July 1995 (received July 19, 1995) submitted for the above-referenced facility. I have included a Memorandum from Mr. Brown whose comments were not adequately addressed after the review of the Draft Proposed Plan. In addition to Mr. Brown's comments the following comment will need to be addressed before this document is considered Final by FDEP:

1. Page 7, Section 2, the supplemental sampling for inorganics was completed for Sites 5 and 17. Why was this data not incorporated into this document? It appears that the "inorganic problem" is open-ended, going onto the Record of Decision, when in reality the data is in our possession.

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: Greg Brown, P.E., FDEP
John Mitchell, FDEP Natural Resource Trustee
Satish Kastury, FDEP
Ashwin Patel, FDEP Northeast District

Mr. Alan Shoultz
August 15, 1995
Page Two

Bart Reedy, USEPA - Atlanta
Jerry Young, City of Jacksonville
Steve Wilson, SOUTHNAVFACENGCOM
Rao Angara, ABB-ES

TJB T JCC JJC ESN ESN

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 ^B

FROM: Greg Brown, P.E., Professional Engineer II, ^{JB}
Technical Review Section

DATE: August 2, 1995

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

I reviewed the subject document dated July 1995 (received July 19, 1995). I had provided comments on the Draft Proposed Plan in a memorandum to you dated June 22, 1995. These comments are ignored in the Final Proposed Plan. I am repeating them here for convenience.

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). See my comments on the Final FS dated August 1, 1995, concerning the economic comparative analysis for SD-2.
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. This should be explicit in the proposed plan and Record of Decision.

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. Alternative GW-6 proposes use of an "in-situ Air Stripping Well". This was not described as an alternative in the

MEMORANDUM
Mike Deliz, P.G.
August 2, 1995
Page Two

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.

5. 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.