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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 7 (OU7) SITE 16  
NAS CECIL FIELD FL  
6/6/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

4.7.1



# 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  
SOUTHNAVFACENGCOM  
Post Office Box 190010  
North Charleston, SC 29419-0068

RE: Draft Baseline Risk Assessment, Operable Unit 7, Site 16,  
dated March 1995, Naval Air Station Cecil Field Florida.

Dear Mr. Shoultz:

The Department has completed the technical review of the Draft Baseline Risk Assessment, dated March 1995 (March 31, 1995) submitted for the above-referenced facility. I have enclosed a Memorandum from Ms. Jane Fugler of the Technical Review Section, who also reviewed this document. Before this document is considered Final, Ms. Fugler's and the following comments need to adequately be addressed:

1. This document was produced concurrent with the review of the Baseline Risk Assessment for Operable Unit 2, Sites 5 and 17. Verbal and written and comments by FDEP were submitted and acceptable responses to those comments took place in meetings in December, April, and May. During that time, FDEP presented concerns and requirements for an acceptable Baseline Risk Assessments (BRA). Most of these concerns have not been addressed in this document and make it difficult to review. The understandings and agreements reached by ABB-ES, the Navy, and FDEP, during the May 1, 1995 meeting, should be incorporated into this document when it is resubmitted as Final. In addition, comments submitted for the OU-2 BRA and the draft comments for the OU-8 BRA (copy enclosed) should be examined to determine if similar questions or deficiencies exist in this document. As can be seen by the enclosed OU-8 BRA comments the document is acceptable with minor changes in its Draft form.
2. Page 3-8, Section 3.2.2, change ".../Bio/box-1..." to ".../Bio/Tox-1...".

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3. Page 3-11, Section 3.4, why is the discussion of the background sampling program for soil, as it pertains to OU-7, in an appendix and not within the main body of this report?
4. Pages 4-1 through 4-26, are too generic and read like a textbook.
5. Page 4-3, Section 4.1.2, as has been discussed numerous times, chemicals should also be screened against FDEP *Soil Cleanup Goals for Military Sites*, dated April 5, 1995.
6. Page 4-7, Section 4.1.3.3, the text states that "...where there are fewer than four samples or where the UCL is greater than the maximum detected concentration..." according to current informal guidance from USEPA Region IV, a 95% UCL should not be calculated if there are less than 10 samples. The maximum value should be used instead of the exposure point concentration.
7. Tables 4-4 and 4-5, these tables should include FDEP *Soil Cleanup Goals for Military Sites*.
8. Tables 4-8 and 4-9, these tables should include FDEP *Groundwater Guidance Concentrations*.
9. Table 4-10, the Child Resident should be added to the Potential Exposed Population column.
10. Page 6-10, Section 6.1.2, sediment should also be screened against FDEP Sediment Quality Assessment Guidelines (SQAG) contained in *Approach to the Assessment of Sediment Quality in Florida Coastal Waters*, dated November 1994.
11. Page 6-15, Section 6.1.4.1, see comment 10.
12. Table 6-5, the cadmium detected listed on this table exceeds the FDEP SQAG. The Probable Effects Limit (PEL) for cadmium is 4.21 mg/kg.
13. Table 6-14, see comment 10.
14. Table 6-15, based on comment 12, cadmium should be listed as a ECPC in sediment.
15. Appendix L, Tables L-1 and L-2, these tables are excellent and should be included in Section 4.

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16. Appendix M, Table M-1 and M-2, these tables are excellent and should be included in Section 4.
17. Appendix T, the model for prediction of groundwater to surface water transport and dilution of ecological chemicals of potential concern (ECPCS) has been omitted. The background sampling program and summary, with supporting data has been mistakenly submitted. The model should be included, and this background sampling summary should be included as a separate appendix.

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  
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TJB <sup>JR</sup> JCC <sup>JE</sup> ESN ESN  
JB

Enclosures (2)