

N60200.AR.004239
NAS CECIL FIELD, FL
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT PROPOSED PLAN FOR OPERABLE UNIT 5 (OU 5) SITE 15 BLUE
10 ORDNANCE DISPOSAL AREA NAS CECIL FIELD FL

7/28/2005

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

July 28, 2005

Commanding Officer
Mr. Mark Davidson, Code ES33
SOUTHNAVFACENGCOM
Post Office Box 190010
North Charleston, SC 29419-9010

RE: Draft Proposed Plan for Operable Unit 5, Site 15, Naval Air
Station Cecil Field, Florida.

Dear Mr. Davidson:

I have completed my review of the Draft Proposed Plan for Operable Unit 5, Site 15, Naval Air Station Cecil Field, dated May 2005 (received May 26, 2005), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Proposed Plan:

- (1) On the first page, second column, third paragraph, it says that surface soil contamination (benzo(a)pyrene equivalentents (BaPEq), arsenic, lead and TRPHs) poses an ecological risk to benthic macroinvertebrates. I am only aware of PAHs and lead being investigated for their toxicity to benthic macroinvertebrates. Also, BaPEq is only relevant to human incremental lifetime cancer risk. It has no validity for ecological risk.
- (2) On page 1, enclosed box on the bottom, second bullet, "implementation" is misspelled.
- (3) On page 6, in the section on Cleanup Objectives and Levels, the site-specific recreational use cleanup goals needs to be explained in greater detail. It should be explained that the cleanup goals are for low-intensity recreational use and that the proposed cleanup goals would not be protective for medium- and high-intensity recreational use. I would suggest a short discussion on what exposure assumptions were used to develop the site-specific recreational use cleanup goals, that the exposure frequency use was 50 days/year, that the exposure duration was 20 years, that the soil ingestion rate was 50 mg/day, that the body weight use was 35 kg. Also, it should be explained that these assumptions correspond to a site that involves infrequent site contact, such as for a hiking trail that has no man-made attractants

"More Protection, Less Process"

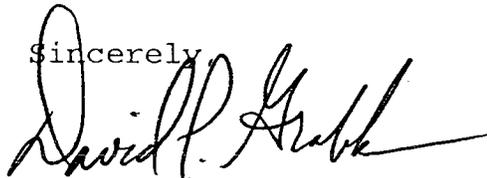
Mr. Mark Davidson
Page Two
July 28, 2005

that would entice people, particularly small children, to frequently visit the site. Finally, it should be stated that the low-intensity recreational use described is consistent with the proposed reuse of the property as a natural resource corridor.

- (4) On page 6, in the section on Cleanup Objectives and Levels, there also needs to be a short discussion on the site-specific acute toxicity cleanup level for lead. This write-up should explain exactly who is being protected using this cleanup number.
- (5) On page 7, in the second to last sentences of the paragraphs discussing Alternatives 3A and 3B, please change "hypothetical future residential receptors" to "hypothetical future low-intensity recreational receptors".
- (6) On page 7, last sentences of the paragraphs discussing Alternatives 2, 3A and 3B, please change "prevent residential land use" to "prevent residential, commercial/ industrial and high- and medium-intensity recreational uses."
- (7) On page 8, second column, in the section "A Closer Look at the BCT's Proposed Cleanup Plan, in subsection 2 on Land Use Controls, please change the first sentence so that the use of the land is limited to low-intensity recreational uses and residential, commercial/industrial and high- and medium-intensity uses are prevented through Land Use Controls.

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

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager

CC: Tim Bahr, FDEP
Doyle Brittain, USEP, Atlanta
John Flowe, City of Jacksonville
Mark Speranza, TtNUS, Pittsburgh
Mike Halil, CH2M Hill, Jacksonville
Mike Fitzsimmons, FDEP, Northeast District

JJC  ESN 