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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REVIEW OF APPLICABLE
OR RELEVANT AND APPROPRIATE REQUIREMENTS FOR REVISED DRAFT RECORD OF
DECISION FOR OPERABLE UNIT 9 (OU 9) SITE 59 NAS CECIL FIELD FL

9/25/2007

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 25, 2007

BRAC PMO SE

Attn: Mrs. Barbara Nwokike
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

RE: ARARs for the Record of Decision for Operable Unit 9, Site 59, Naval Air Station
Cecil Field, Jacksonville, Florida

Dear Mrs. Nwokike:

Because the Department deemed certain changes that the EPA requested be made to the Record of Decision (ROD) for Operable Unit 9, Site 59, Naval Air Station Cecil Field, to be potentially significant, the Department has taken a closer look at the list of State's applicable or relevant and appropriate requirements (ARARs) for this ROD. One of the State's main responsibilities under the Federal Facilities Agreement (FFA) for Cecil Field is to identify State cleanup requirements that are more stringent than EPA's criteria. The list of State ARARs that were in Tables 2-3 and 2-4 of the revised draft ROD for Site 59 (e-mailed on September 10, 2007) were acceptable to the Department. However, the changes to those tables proposed by EPA prompted the Department to re-evaluate the applicability of its rules as ARARs. In particular, after reflection, it appears that the substantive portions of Chapter 62-780, Florida Administrative Code (F.A.C.), are generally applicable to cleanups at Superfund sites, including Site 59, and are not otherwise covered in the Cecil FFA. Specifically, the following rules apply: F.A.C. Rule 62-780.680, No Further Action and No Further Action with Controls; F.A.C. Rule 62-780.690, Natural Attenuation with Monitoring; F.A.C. Rule 62-780.700, Active Remediation; and F.A.C. Rule 62-780.750, Post Active Remediation Monitoring.

These rules have been identified because the selected remedy for Site 59 is comprised of active remediation and natural attenuation. It is expected that some form of post active remediation monitoring may be required, although this may be covered in the natural attenuation portion of the remedy. These rules, in conjunction with the no further action criteria, spell out the Department's action-specific requirements for completing site cleanup to the Department's chemical-specific ARARs. I reiterate that the Department considers the substantive portions of Chapter 62-780, F.A.C., to be generally applicable or relevant and appropriate to cleanups at Superfund sites.

Mrs. Barbara Nwokike
ARARs for the ROD at Site 59
September 25, 2007
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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: Doyle Brittain, USEPA, Atlanta
John Flowe, City of Jacksonville
Mark Speranza, TtNUS, Pittsburgh
Mike Halil, CH2M Hill, Jacksonville
Mike Fitzsimmons, FDEP, Northeast District
Tim Bahr, FDEP

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