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NAS KEY WEST
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON STATEMENTS OF BASIS FOR SOLID WASTE MANAGEMENT UNITS 5
AND 7 NAS KEY WEST FL

2/2/1999

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

7046-3.1-20050

IC

00502C

Jeb Bush
Governor

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

David B. Struhs
Secretary

RECEIVED
2-12-99

February 2, 1999

Ms. Martha Berry
US EPA
61 Forsyth Street, SW
Atlanta, GA 30303-3104

RE: Statement of Basis for SWMUs 5 and 7. Naval Air
Station Key West, Florida

Dear Ms. Berry:

Responding to commitments to review the above referenced documents dated January 1999 (received January 22, 1999) in time to issue the final version for the public availability session, I have the following comments.

SWMU 5

Page 1 of 7, Proposed Remedy Section: language stating that the proposed remedy is "monitoring with land use controls" needs to be more specific as to what media will be monitored.

Page 3 of 7, last paragraph, left hand side: replace confusing language with "In addition, cadmium, chromium, copper, lead and zinc were detected in surface water at two sampling locations".

Page 4 of 7, fourth paragraph: add to "upper boundary of one in ten thousand "for exposure to..." and insert appropriate media and constituent exposure.

Page 4 of 7, fifth paragraph: be more specific as to the media in which arsenic and chromium were found.

Page 4 of 7, Monitoring with Land Use Controls: this is a very long paragraph and I suggest separating some sentences.

Page 4 of 7, Monitoring with Land Use Controls: language stating "If after the first year, inorganics are not detected at or above industrial actions levels agreed to by the NAS Key West team..." is confusing and needs to be rewritten. There are no industrial "action levels" for groundwater, surface water, or sediment.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Martha Berry
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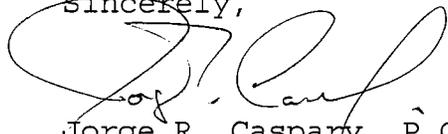
SWMU 7

Facility Background, page 2 and 3 of 7: it appears that the sole PCB detected in soils at SWMU 7 was removed as part of the removal action. I recommend updating this and the following paragraph since the information may not be applicable to soils that are no longer there. The only pertinent information needed in this section is that which pertains to site conditions post-removal of soils.

Page 3 of 7, Summary of Facilities Risks: please clarify whether the Risk Assessment was conducted pre or post-removal of soils.

If I can be of any assistance in this matter, please contact me at 904/488-3935.

Sincerely,



Jorge R. Caspary, P.G.

cc: Chuck Bryan, TTNUs-Aiken
Ron Demes, NAS Key West
Bob Cohose, Bechtel-Oak Ridge

TJB B

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