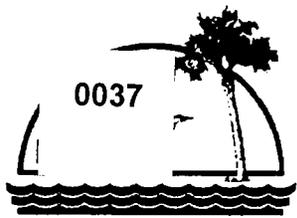


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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SUMMARY OF RESIDUAL RISK AT BASE REALIGNMENT AND CLOSURE
PROPERTIES AT TRUMAN ANNEX NAS KEY WEST FL

5/1/2001

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

RECEIVED
5-14-01

May 1, 2001

Q A Record

Mr. Dudley Patrick, Code 1858
Post Office Box 190010
Southdiv NAVFACENCOM
2155 Eagle Drive
North Charleston, South Carolina 29406

RE: Summary of Residual Risk at BRAC Properties (Truman Annex Parcels). NAS Key West, Florida

Dear Mr. Patrick:

I have reviewed the above referenced document dated March 2001 (received March 30, 2001). I have the following comments.

1. It appears that the document has been generated in conjunction with the City of Key West reuse plan. Under the proposed land uses, our team concurred that where excavations were terminated due to obstructions i.e., roads, walls, etc., those obstructions would become engineering controls that needed to become part of deed restrictions, imposed on the City of Key West, so as to prevent their disturbance. Since local governments tend to change land uses, it would be prudent to clarify that the unrestricted residential scenario has not been evaluated and that the referenced risk document is based on the approved reuse plan.
2. The Department's Incremental Cancer Risk (ICR) default value is 1×10^{-6} . Please correct this omission throughout the Document.
3. Page 3-3: Given the population pressures on the City of Key West, it would also be prudent to clarify that in spite of a lack of potable water wells in the parcels, the Navy intends to impose access restrictions on groundwater access by proposing restrictive covenants in transfer documents.

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

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Mr. Dudley Patrick

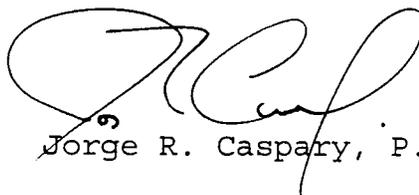
Page Two

May 1, 2001

4. Page 1-2, Parcel A: the text states that "clean fill was placed in the excavation to reduce the possibility of exposure to potentially contaminated soil below two feet". Yet, further down the paragraph states, "confirmation sampling showed no analytes detected at concentrations above action levels". These two sentences contradict each other and need to be addressed.
5. This office has received neither the official FOST nor the Environmental Baseline Survey (EBS) of the properties under transfer consideration. Please provide a hard copy of the FOST and EBS so they can be correlated with the residual risk remaining after the soil excavations.

If I can be of any further assistance in this matter, please contact me at 850/921-9986.

Sincerely,



Jorge R. Caspary, P.G.

cc: Chuck Bryan, TTNUs-Aiken
Turpin Ballard, EPA-Atlanta
Bob Courtright, NAS Key West
Karen Snodgrass, Southdiv

TJB B JJC JJC ESN ESN

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