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NAS CECIL FIELD, FL
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"EMAIL REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT ACTION MEMORANDA FOR POTENTIAL SOURCES OF
CONTAMINATION 21, 25, 39 AND 42 NAS CECIL FIELD FL"

11/28/2000

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

From: David Grabka TAL 850/488-3093 [SMTP:David.Grabka@dep.state.fl.us] <mailto:David.Grabka@dep.state.fl.us>
Sent: Tuesday, November 28, 2000 10:38 AM
To: Vaughn-Wright.Debbie; davidsonme; glasssa; speranza; david.grabka; sross; simcirk
Subject: Draft action memos: PSCs 21, 25, 39 and 42

Team, I've completed my reviews of these. Sorry for the long wait. Here are my comments:

PSC 21

Based upon the removal action design package, some soils are to be left in place that still exceed leachability criteria. Dieldrin is the contaminant that is left most often above its leachability criteria as it has a very low leachability number (4 ppb). However, TRPH and total chlordane (dieldrin as well) is left in sample location 90S0221 at levels exceeding leachability criteria. Its stated that the "pickup level" for COCs are the lesser of leachability criteria and 3 times the industrial SCTL. However, the pickup levels in the table on page 1 of the removal action design package is just the 3 times industrial SCTL.

This site is apparently only being cleaned up to industrial levels. While the removal action design plan figure is somewhat useful, it would be very beneficial to have a separate figure that shows the contaminant concentrations that will still be left after the dig and haul is complete. This will aid in determining the area that will require land use restrictions.

Has a determination been made whether some of the soil to be excavated would be regulated as listed hazardous waste and would require disposal at a TSD facility?

Site 25

Dieldrin is excluded from consideration in the draft action memo. It should be a contaminant of concern for this site. Apparently sample CEF-080-OW4-SB08 had concentration of TRPH well above 3 times the residential SCTL and the leachability SCTL. Please make sure this area is located within the excavation boundaries or otherwise explain why it is not addressed.

Same comment as above concerning a figure with the concentrations left behind.

Also, same comment concerning listed hazardous waste considerations.

PSC 39

In the food chain modelling, it was stated that upper level receptors considered included the bullfrog. However, I can't find that the bullfrog's exposure to PCBs was considered in the final decision as to what concentration of PCBs are to be left on site post remediation. It would seem based upon the bullfrog's limited range and constant exposure, it would be the receptor most likely to be affected by the contamination.

PSC 42

Same comment as on PSC 21 concerning pickup levels in the table in the removal action design package. Also, dibenzo(a,h) anthracene was also detected at concentrations well above its residential SCTL. It would appear that benzo(a)pyrene equivalents would be much more appropriate as a COC to be cleaned up to residential levels.

Same comment concerning a figure with the contaminants to be left post remediation as for PSC 21 and 25.

Hope this is of some help and does not cause any undo consternation.

Dave