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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON PUBLIC HEALTH ASSESSMENT NAS CECIL FIELD FL
8/14/2001
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

August 14, 2001

Chief, Program Evaluation, Records, and Information Services
Branch

Division of Health Assessment and Consultation
ATSDR, Mailstop E-56
1600 Clifton Road, NE
Atlanta, Georgia 30333

RE: Public Health Assessment for Naval Air Station Cecil Field
(a/k/a Cecil Field Naval Air Station), Jacksonville, Duval
County, Florida.

Dear Mr. Grosse:

The Department has completed its review of the Public Health Assessment for Naval Air Station Cecil Field (a/k/a Cecil Field Naval Air Station), dated June 22, 2001 (received July 5, 2001). The Department has certain concerns with the report where it recommends that the Navy and/or the Department take certain actions that do not seem warranted based on the information available.

- (1) ATSDR recommends that the Department should provide educational material to be broadcast on radio or television or printed in the newspaper warning well owners of the possible regional contamination hazards associated with the Jet Fuel Pipeline between NAS Cecil Field and NAS Jacksonville. It is also recommended that the Department prompt them to have their wells sampled annually for VOCs, SVOCs, pesticides and metals. This recommendation does not appear warranted based on the information currently available from the Navy. While groundwater contamination has been detected at "A" Avenue and 103rd Street and the Hawkins property, the groundwater contamination at these locations has been adequately assessed and is under remediation. Several other investigations have not detected groundwater contamination. The latest investigation has only detected low-level Polynuclear Aromatic Hydrocarbons and TRPH in soils in the vicinity of the pipeline. The Department believes that it would be unwarranted to unnecessarily worry residents along the pipeline of contamination without there being indications of

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potential contamination. Also, because jet fuel is the potential source of contamination, the Department would only require sampling and analysis of the Gasoline and Kerosene Analytical Groups specified in Table B of Chapter 62-770, Florida Administrative Code.

- (2) ATSDR recommends that the Department provide notification/information to planning/permitting departments on local groundwater contamination along the 103rd Street Jet Fuel Pipeline so that developers or residents can be informed that new wells need wellhead protection. As stated above, the Department has no information on groundwater contamination associated with the pipeline at locations other than those already being addressed by the Navy. The Florida Department of Transportation, which has the right-of-way over most of the Jet Fuel Pipeline, has been notified of the results of the Navy's investigations. As the latest assessment results have only indicated minor soil contamination, the Navy is attempting to coordinate with FDOT to maintain current land uses for those areas that have indicated contamination. The low-level soil contamination detected should not pose an unacceptable risk to human health or the environment if the FDOT roadways are maintained and residential development is prohibited in the immediate vicinity of those sites.
- (3) In several locations within the document, the Florida Department of Environmental Protection is incorrectly called the Florida State Environmental Protection Agency. This needs to be corrected. Also, the local FDEP Emergency Response number is (904)807-3300 according to the Department's web page.
- (4) ATSDR has also identified indoor air influenced by volatile compounds volatilizing from contaminated groundwater as an indeterminate Public Health Hazard. If there had been complaints of odors from those buildings, the Department would have required that the odors be investigated and the potential for volatile compounds to seep into buildings be assessed. The Navy has used the Connecticut Department of Environmental Protection's reference concentrations as a screening tool to determine where possible problems to indoor air may exist. At this time there are no indications that groundwater contamination on the base is adversely affecting indoor air. Also, the sampling for biogenic gases (methane, ethane, etc.) does not appear warranted as the concentrations of those gases from anaerobic degradation

of contaminants in groundwater would be unlikely to be at concentrations that would result in a threat to public health.

- (5) ATSDR recommends that routine drinking water sampling should be done on any systems fed by wells on base, well owners should implement wellhead protection, that the integrity of the casings of old wells be evaluated, that notification of groundwater hazards be given to developers and be on file with the county and that new well installation should be restricted without wellhead protection, corrosion resistant casings, aquifer protection during drilling, and if needed, water treatment. The Department regulates drinking water facilities under Chapter 62-550, Florida Administrative Code, which spells out the frequency of monitoring of water quality provided by the system. The abandonment of old wells and installation of new wells is regulated by the St. Johns River Water Management District, which provides specific criteria for well abandonment and installation. Under an agreement undertaken between the Navy, EPA and the Department, for those areas where groundwater contamination has been detected above Florida Groundwater Cleanup Target Levels, Land Use Control Implementation Plans restricting groundwater use are developed by the Navy as long as the property remains in Navy ownership. At the time of property transfer to a subsequent owner, Restrictive Covenants implementing institutional controls will be recorded in the deeds that will restrict installation of wells and use of groundwater.
- (6) EPA and the Department have been fully involved in the assessment of lead and PAH contamination at Site 15. The Department believes that the Navy has adequately assessed the area in preparation for remedial actions at the site. ATSDR's recommendation that the site be reassessed to determine lead concentrations in the top 3 inches of soil, the distribution of lead within the soil column and the bioavailability of lead in order to determine the lead hazard present would invalidate the data taken so far and would potentially delay the anticipated remediation of the site for years. The Department believes that a remedial action can be derived from the data collected to date by the Navy that will be protective of human health and the environment.
- (7) ATSDR recommends that fish and turtles be collected from Yellow Water or Sal Taylor Creek draining Site 15. The

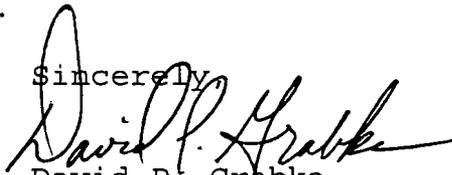
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Department is unaware of data that would indicate that contaminants from Site 15 have impacted either Yellow Water or Sal Taylor Creek. Please identify the source of information that leads ATSDR to believe that this may be the case.

- (8) The Department concurs with ATSDR's recommendation that educational material should be developed by the Navy concerning the disturbance of unexploded ordnance with contact information provided. Based on the information provided by the Navy, the Department does not believe that digging and excavation restrictions will be necessary at this time.
- (9) ATSDR recommends re-evaluating groundwater sampling and analysis for additives to petroleum including lead, icing inhibitor, anti-oxidants, corrosion inhibitor, metal deactivator, static dissipator, biocides, conductivity additives, detergent additives, thermal stability additives and oxygenates. The Department has specific compounds considered additives that are to be analyzed for at petroleum contaminated sites. These include lead, 1,2-ethylene dibromide, MTBE and 1,2-dichloroethane. The Department has no regulatory authority under Chapter 62-770, Florida Administrative Code, to require further analysis. If ATSDR has information on the specific compounds in the additives listed above, the EPA methodology to analyze for those compounds, human health or regulatory criteria applicable to those compounds and specific instances where those compounds were detected, the Department will consider the need to implement limited testing of groundwater at locations across the base to determine if those compounds are of concern.

If you have any concerns regarding this letter, please contact me at (850) 921-9991.

Sincerely,



David P. Grabka
Remedial Project Manager

CC: Satish Kastury, FDEPA
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Mike Fitzsimmons, FDEP, Northeast District

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