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NAS CECIL FIELD, FL  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON DRAFT RECORD OF DECISION FOR OPERABLE UNIT 11 (OU 11) SITE 45  
NAS CECIL FIELD FL  
2/7/2003  
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

February 7, 2003

Mrs. Debbie Vaughn-Wright  
Remedial Project Manager  
United States Environmental Protection Agency  
Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

RE: Record of Decision, Site 45, Naval Air Station Cecil Field

Dear Mr. Davidson:

The Department has completed its review of the Record of Decision, Site 45, Naval Air Station Cecil Field, dated December 12, 2002 (received via e-mail January 24, 2003), prepared by Debbie Vaughn-Wright, EPA Region 4, and Scott Glass, Southern Division Naval Facilities Engineering Command. The Department has the following comments on the Record of Decision:

- (1) Section 1.2, last sentence. Please remove this sentence. The Department has not officially given concurrence with the selected remedy. The Department's concurrence will be officially conveyed in an approval letter signed by the Director of the Division of Waste Management.
- (2) Section 1.4, page 1-2, third bullet, last sentence. Please remove the last sentence and replace with "Due to the lengthy projected time frame for reaching clean-up goals for groundwater (900-1300 years), periodic reviews of new technologies which may address vanadium in groundwater shall be conducted. This review may be conducted in conjunction with the five-year review." This language is essentially taken from Component 4 in Section 2 on page 2-34.
- (3) Section 2.10.1, page 2-25, second bullet. Please remove the last two sentences that read "So long as exposure to the groundwater is prohibited, the remedial action objectives are met. Therefore, this remedy is protective."
- (4) Section 2.10.1, page 2-25, third bullet. Please rewrite this paragraph as follows: "The vanadium contaminant plume is small and stable and confined to the shallow aquifer, and there is no evidence of ongoing contaminant migration. Additionally, the viability of currently available technologies for remediation of vanadium in groundwater is

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Mrs. Debbie Vaughn-Wright

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limited. Therefore, so long as exposure to groundwater is prohibited, Alternative 2 is considered to be adequately protective at a much more reasonable cost than active treatment. New technologies may become available in the future that may provide a practical, cost effective and reliable alternative."

- (5) Section 2.10.2, Component 4, page 2-34, second paragraph, first sentence. Please replace "should" with "shall".
- (6) Section 2.11.3, page 2-34, fifth bullet. Please remove the Drinking Water Criteria from the list of To Be Considered (TBCs) and add this to the list of ARARs listed in Section 2.11.2. Please also change the regulation from FAC Chapter 62-520 to FAC Chapter 62-550.
- (6) Section 2.10.2, Component 2: Long Term Monitoring, should be rewritten to clarify that if two consecutive sampling events indicate that the vanadium PRG has been met in all sampled monitoring wells, the site will be considered as remediated only for vanadium in groundwater. This clarifies that groundwater in all the wells, including source wells, side-gradient and downgradient wells must attain the vanadium PRG before the aquifer is remediated with respect to vanadium. Also, as it is currently written, it could be interpreted that if the vanadium PRG is met in groundwater, that both soil and groundwater would be considered remediated. While this is nonsensical, it would be prudent to avoid the possibility of such an argument. Please revise Component 3: Contingency Remedy similarly.

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: Scott Glass, Southern Division

TJB \_\_\_ JJC \_\_\_ ESN \_\_\_