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NAS CECIL FIELD, FL
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EMAIL REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON REMEDIAL INVESTIGATION WORK PLAN FOR BUILDING 824A AND
BUILDING 312 NAS CECIL FIELD FL
7/24/2001
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

-----Original Message-----

From: Grabka, David [SMTP:David.Grabka@dep.state.fl.us]
Sent: Tuesday, July 24, 2001 2:30 PM
To: Debbie Vaughn-Wright (E-mail); Mark Davidson (E-mail); Mark Speranza (E-mail); Mark Jonnet (E-mail); Sam Ross (E-mail); Scott Glass (E-mail)
Cc: Bahr, Tim
Subject: Comments on the RI Work Plan for PSCs (Bldg 824a and 312)

Team,

My comments are listed below:

- (1) Page 1-2, Second Paragraph: Replace Base Closure Team with BRAC Cleanup Team.
- (2) Page 1-2, Last Sentence: [62-770 Florida Administrative Code (F.A.C.)] should be [Chapter 62-770, Florida Administrative Code (FAC)]
- (3) Page 2-3, Section 2.4, Second Paragraph, Second Sentence: "It was determined that not all samples with concentrations greater than . . . " This does not belong in this paragraph or even in this section of the report. The rest of the paragraph talks about what will be done, and this sentence talks about events in the past tense. Also, while the entire data set will be used and a statistically based approach will be used, hot spots may also need to be addressed as they may pose an unacceptable risk to an exposed population that were to frequent that area.
- (4) Page 2-3, Section 2.4, Fifth Paragraph: It should be the 95% UCL, not just the UCL.
- (5) Page 2-4, Section 2.5, Third Paragraph, Second Sentence: Please replace the portion of the sentence "While a site may have numerous hypothetical receptors, as a site-screening tool, it is common to use the most sensitive human for risk calculations." with "While a site may have numerous hypothetical receptors, during the preliminary risk evaluation, it is common to use the most sensitive human for risk calculations."
- (6) Page 2-6, Section 2.6, Paragraph after the bullets: As this part of the report is general and not site-specific, it is not warranted to state that based on existing data, the following alternatives are most likely to be considered. This should be removed.
- (7) Appendix A: The Summary of Previous Investigations was a little confusing as to what happened when. It starts with the Phase II investigation at Main Base Area 18, goes back to Day Tank 1 investigations and never mentions whether there was a Phase I investigation and what were the results from it.
- (8) Appendix A: Please describe the rationale for using a 10 foot well screen for the deep wells, as the intermediate wells are to only have a 5 foot screen.
- (9) Appendix A: Please provide figures showing groundwater elevation contours. These figures should reveal the rationale for the exact placement of wells as proposed in the RI Work Plan.

(10) Appendix A, Table A-3: Please check the bottleware and holding time for TRPH, it does not conform with Appendix B, Table B-3.

(11) Appendix A, Figure A-6, Preliminary CSM for EcoRisk Assessment: Please determine if inhalation is a potential exposure mechanism/pathway for terrestrial wildlife, especially considering burrowing animals.

(12) Appendix B, Second Page, Second Paragraph: CEF-B312-02 and CEF-B312-03 should be replaced with CEF-B312-02S and CEF-B312-03S.

(13) Appendix B, Second Page: Exceedances of GCTLs in Phase II sampling for well CEF-B312-08S included 1,1-DCE; 1,1-DCA and naphthalene.

(14) Appendix B, Table B-1, Page 1 of 2: Last column on the right, 1,1-DCE should be shaded.

(15) Appendix B, Table B-1, Page 2 of 2: Last column on the right, it should be well CEF-B312-08S. It is listed as CEF-B312-06S.

(16) Appendix B: Please provide figures showing groundwater elevation contours. These figures should reveal the rationale for the exact placement of wells as proposed in the RI Work Plan.

(17) Appendix B, Groundwater Investigation, First sentence: Please add naphthalene to the list of groundwater contaminants that the investigation is to delineate.

(18) Appendix B, Figure B-5, Preliminary CSM for EcoRisk Assessment: Please determine if inhalation is a potential exposure mechanism/pathway for terrestrial wildlife, especially considering burrowing animals.

If you have any questions please call me at (850) 921-9991 or if you need to leave a voice message (850) 488-3693.

David P. Grabka
Remedial Project Manager
Florida Department of Environmental Protection
Division of Waste Management
Bureau of Waste Cleanup
Technical Review Section