

N60200.AR.005607  
NAS CECIL FIELD  
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING THE FINAL FEASIBILITY STUDY FOR OPERABLE UNIT 3 NAS  
CECIL FIELD FL  
8/2/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

August 2, 1994

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Commanding Officer  
Mr. Alan Shoultz, Code 1875  
SOUTHNAVFACENGCOM  
Post Office Box 190010  
North Charleston, SC 29419-0068

RE: Final Feasibility Study, Operable Unit 2, Naval Air Station  
Cecil Field, Florida.

Dear Mr. Shoultz:

Mr. Greg Brown and I have completed the technical review of the Final Feasibility Study, dated July 1995 (received July 10, 1995) submitted for the above-referenced facility. I have included a Memorandum from Mr. Brown who has offered comments to be considered during the remedy design, construction, and operation. This Feasibility Study has met the needs of FDEP and can be considered Final pending approval by USEPA.

If you have any concerns regarding this letter, please contact me at (904) 921-9991.

Sincerely,

Michael J. Deliz, P.G.  
Remedial Project Manager

CC: Greg Brown, P.E., FDEP  
John Mitchell, FDEP Natural Resource Trustee  
Satish Kastury, FDEP  
Ashwin Patel, FDEP Northeast District  
Bart Reedy, USEPA - Atlanta  
Jerry Young, City of Jacksonville  
Steve Wilson, SOUTHNAVFACENGCOM

TJB 5 JCC JE ESN ESN

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

Florida Department of  
**Environmental Protection**

**Memorandum**

**TO:** Mike Deliz, P.G., Remedial Project Manager,  
Technical Review Section

**THROUGH:** Tim Bahr, P.G, Supervisor, Technical Review Section **B**

**FROM:** Greg Brown, P.E., Professional Engineer II, **AB**  
Technical Review Section

**DATE:** August 1, 1995

**SUBJECT:** Final Feasibility Study, Operable Unit 2, NAS Cecil  
Field, Florida.

I reviewed the subject document dated July 1995 (received July 10, 1995). It is adequate for its intent. I am providing comments for the record, however, that have been given previously to the Navy on related documents. I hope the Navy will consider these comments during remedy selection, design, construction, and operation.

- 1) A key performance parameter for landfarming and windrow composting is maintaining a balance between optimum moisture and oxygen content within the soil. Managing optimum moisture conditions for bioremediation will be difficult at the Site 5 soil treatment unit limiting its ultimate effectiveness. Less effective physical processes such as volatilization, leaching, dilution, and photo-oxidation may prove to be more important. Treatment of PCBs, beyond blending and dilution, will be minimal at best. The Navy should anticipate contingencies for failure.
- 2) Alternative SD-2 assumes that the sediments are not RCRA hazardous wastes by listing or characteristic. The Navy must insure that no RCRA wastes are treated in the soil treatment unit, otherwise RCRA facility standards will apply. The Navy must also insure that the treated sediments or soil achieves clean soil criteria before placement and disposal outside the soil treatment unit. If the sediments or soil are predominantly petroleum contaminated media and no other ARAR applies, then Rule 62-775, F.A.C., may be applicable as clean soil criteria. The Navy will need to document these conditions prior to disposal.
- 3) The economic comparative analysis for Alternative SD-2 considers the expense of the soil treatment unit a "sunk cost" since it was used as an Interim Remedial Action. This may inadvertently misrepresent the true costs of this alternative. There are numerous ways to include the true

MEMORANDUM

Mike Deliz, P.G.

August 1, 1995

Page Two

economic costs. For example, one method is to use the market value treatment cost (e.g., \$ per cubic yard, etc.) for similar treatment facilities in Florida (if there are any). An alternative method if there are no comparable treatment facilities is to use the actual capital cost of the treatment unit amortized at the government's borrowing rate (say, the current 30-year interest rate) over the unit's useful life. If the sediments require six months to treat, the amortized cost (e.g., "rent") for this period along with O&M expenses could be included into the total cost of this alternative. This method assumes 100% utilization of the unit over its life time; otherwise, the unused portion of the treatment unit's life will indeed represent a "sunk cost".

- 4) Alternative GW-6 proposes use of an "in-situ Air Stripping Well". This is an innovative technology that offers potentially significant advantages for site remediation. It's success, however, is dependent on having a good understanding of site-specific conditions. Additional site-specific hydrologic studies should be conducted, particularly a pumping test, before committing to this technology whole-heartedly.

If you have any questions concerning my comments, please call me at (904) 488-3935.