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NAS CECIL FIELD  
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT REMEDIAL INVESTIGATION REPORT AND DRAFT  
BASELINE RISK ASSESSMENT OPERABLE UNIT 2 (OU2)NAS CECIL FIELD FL  
12/15/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

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Secretary

December 15, 1994

Mr. Steve Wilson  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
Code 1865  
P.O. Box 190010  
Charleston, South Carolina 29411-9010

Re: NAS Cecil Field Superfund Site

1. Draft Remedial Investigation, Operable Unit 2, November, 1994
2. Draft Baseline Risk Assessment, Operable Unit 2, November, 1994

Dear Mr. Wilson:

We have reviewed the above referenced documents and provide the following comments.

## Remedial Investigation, Operable Unit 2

### 1. Executive Summary

The last sentence of the 5th paragraph on Page ii states, "Groundwater contaminants do not pose any ecological risk." However, the next paragraph indicates a potential risk to benthic organisms within the adjacent ditch. The contamination within the ditch has likely occurred due to contaminated groundwater leaching into the ditch (see p. 3-22, par. 3), as well as from migration of contaminated soil. The migration of groundwater, therefore, poses a potential ecological risk.

The second paragraph on page iii indicates that contamination of VOCs, SVOCs, 4,4'-DDE, and metals in the wetland east of Site 17 likely from other sources or are naturally occurring. However, the surface runoff from the site is toward the wetland (see Figure 3-5 and p. 3-6, 2nd

December 15, 1994  
NAS Cecil Field  
Page 2

par.). The VOCs and SVOCs are not indicative of the environment, and the metals were elevated compared to background. These were the same constituents identified for soil and groundwater at Site 17. However, if Site 17 is not the source of this contamination, then the source should be determined.

2. Section 4.2.2.2 (SVOCs in Subsurface Soils)

Figure 4-10, indicates that the area of total SVOC concentration equal or greater than 6,000  $\mu\text{g}/\text{kg}$  does not extend beyond the confines of the adjacent drainage ditch. This is also indicative of subsurface sediment being contaminated with SVOCs above this value, or SVOCs are in the surface sediment at this contaminated level. Does the 6,000  $\mu\text{g}/\text{kg}$  value possibly extend beyond the confines of the ditch?

3. Section 4.2.2.3 (Pesticides and PCBs)

Figure 4-16 indicates that PCBs are also limited by the drainage divide, which indicates contamination of ditch sediment. Although PCBs were not detected in the soil samples south of the ditch, contamination may exist on the south side at locations closer to the ditch. This should be confirmed.

4. Section 4.2.3.5 (Summary and Interpretation of Analytical Results for Groundwater)

The section segment "SVOCs" (p. 4-117 and 4-118) states: "Well CEF-5-91 is south of the ditch and groundwater flow direction at this location is northeast, or against the flow direction at Site 5. The bis(2-ethylhexyl)phthalate concentration in Sample CEF-5-9I is probably not related to Site 5." The Maximum Contaminant Level (MCL) was exceeded for this SVOC at this well, and also at wells CEF-5-5S and CEF-5-6S which are site related. If the contamination in well CEF-5-9I is not site related, then what is the source. Bis(2-ethylhexyl)phthalate is not naturally found in the groundwater.

5. Section 4.2.4 (Surface Water and Sediment)

No reference is made in this section to the specific exceedence of surface water standards and sediment

December 15, 1994  
NAS Cecil Field  
Page 3

guidelines. Yet in the section on soil and groundwater, specific comparisons were made to exceedence of background or MCLs. This should also be noted for surface water and sediment exceedence of standards and guidelines.

6. Section 4.3.4.1 (Summary of Surface Water and Sediment Results)

The summary should include a comparison to surface water and sediment Applicable Relevant and Appropriate Requirements (ARARs) as was done for groundwater.

7. Section 6.3.1 (Ecological Risk for Site 5)

The last paragraph of this section indicates that, due to the dilution factor of groundwater upon entering the ditch, no risks were identified "for aquatic receptors associated with ECPCs in groundwater." However, as the contaminants in groundwater migrate into the ditch, the sediment will tend to absorb the contaminant therefore increasing the risk to the benthic community.

8. Section 7.3.3 (Recommendations)

The first paragraph on page 7-15 states "there is no health or ecological risk associated with the contaminants in the groundwater" unless the site were to become residential. The migration of the groundwater into the ditch still poses a threat to the benthic community (see comment #7).

Also, excavation and remediation of the ditch sediment just south of the pit area would eliminate the current ecological risk. If the groundwater is not contained from entering the ditch, then continued monitoring for the contaminants of concern should be performed on the ditch sediment.

9. Appendix M (Sediment and Surface Water Data)

The detection limits (DL) for some of the constituents in surface water and sediment were well above Florida Surface Water Quality Standards (FSWQS) and the Region IV Sediment Guidelines. Specifically for surface water:

December 15, 1994  
NAS Cecil Field  
Page 4

Constituent	FSWQS ( $\mu\text{g/L}$ )	DL ( $\mu\text{g/L}$ )
Total PAH	.031 annual avg.	10
PCBs	.014 max.	1
Chlordane	.004 max.	.05
4,4-DDT	.001 max.	.1
Dieldrin	.0019 max.	.1
Endosulfan	.0087	.1
Endrin	.0023	.1
Heptachlor	.0038 max.	.05
Beryllium	.013 annual avg.	.23
Mercury	.012	.08
Silver	.07	.14

The Contract Lab Program Practical Quantitation Limits (CLP-PQL) established in the Region IV Sediment Guidelines for semivolatile compounds in sediment analysis is 330  $\mu\text{g/kg}$ . These DLs were exceeded in the sediment analysis. However, the sampling and analysis was performed prior to the establishment of these guidelines. In the future, any sediment analysis should follow these guidelines.

Also, the semivolatile DLs increased or differed from each sediment sampling location. The DLs should be constant. What was the reason for this variance?

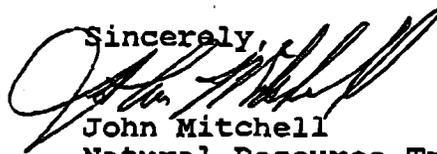
#### Baseline Risk Assessment. Operable Unit 2

Our only comment concerning the BRA concerns the ecological risk associated with Site 5. We agree with the recommendations for soil and sediment. Specifically, we believe the removal of hot spots in the ditch would be of benefit, and would likely prevent any mitigative measures. As residual contamination would remain even with "hot spot" removal, we also agree with establishment of a bio-monitoring plan for the ditch sediment. This should also include continued monitoring of the sediment and surface water, especially, if no effort is made to remediate the groundwater or prevent continued contaminated groundwater migration into the ditch.

December 15, 1994  
NAS Cecil Field  
Page 5

We appreciate the opportunity to be involved in the investigation and remediation plans at NAS Cecil Field. Please keep us informed of all remedial investigations and activities at the station. Should you have any questions, please contact me at (904) 487-2231.

Sincerely,



John Mitchell  
Natural Resource Trustee Project  
Manager, Office of  
Intergovernmental Programs

cc: Pat Kingcade, FDEP  
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Jim Lee, DOI  
Waynon Johnson, NOAA  
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