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NAS CECIL FIELD, FL  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON DRAFT THIRD FIVE YEAR REVIEW REPORT NAS CECIL FIELD FL  
09/10/2010  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

September 10, 2010

BRAC PMO SE  
Attn: Mr. Art Sanford  
4130 Faber Place Drive  
Suite 202  
North Charleston, SC 29405

RE: Draft, Third Five-Year Review Report, Naval Air Station Cecil Field, Jacksonville, Florida.

Dear Mr. Sanford:

I have completed my review of the Draft, Third Five-Year Review Report, Naval Air Station Cecil Field, dated April 2010, prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Draft Report:

- (1) In Sections x.6.2, it says that site inspections for the 5-year review will be conducted on February 11, 2010. As these reviews have already occurred and the checklists provided in Appendix B, please change the sentence to the past tense, provide the correct dates of the inspections, and please provide a one or two sentence summary of the conclusions resulting from observations taken from the inspections.
- (2) As land use controls are considered a necessary component in the remedies for all the sites discussed in the 5-year review, and as inspections and reporting are a part of the land use control remedy, please provide a better account of the inspections that have occurred, especially with regard to those inspections carried out by the Jacksonville Economic Development Commission (JEDC) and the Jacksonville Airport Authority (JAA). Please include dates that the inspections occurred and whether any deficiencies were noted.
- (3) On page 3-10, in the middle of the third paragraph, please replace "ag/" with " $\mu\text{g/L}$ ".
- (4) In Section 4, which discusses Operable Unit 3, Site 8, the discussion of the cleanup numbers consistently refer to the Department's Brownfields Cleanup Criteria Rule. Please note that Site 8 is a Superfund site and that cleanup numbers applicable specifically to Brownfields cleanup sites are not appropriate.

Please refer to Chapter 62-777, Florida Administrative Code (F.A.C.), as the proper reference for cleanup numbers.

- (5) On page 5-2, in the section on **Land and Resource Use/History of Contamination**, last sentence, it says that PAHs at Site 15 are "most likely as a result of the burning reactions of wood, brush, duff and other organics from fires in the forested area." While fires have potentially contributed to the PAH contamination at the site, the site's use as a skeet range and a place where ordnance was burned and buried are more likely the source of much of the PAH contamination discovered on the site.
- (6) On page 5-3, in the paragraph after the bullets, please add "low-intensity" before recreational SCTLs.
- (7) On page 7-5, Section 7.4.3.1, first sentence, please note that the reason the AS/VE system was shut down was not because emissions rate detected during the vapor sampling events was consistently less than the allowable regulatory limit of 13.75 pounds per day of total VOCs. The reason stated would be a reason not to have to treat off-gas effluent from the VE system, not a reason to turn off the AS/VE system.
- (8) In the table on page 9-12, the current arsenic residential SCTL is 2.1 mg/kg. In the same table, the TRPH residential SCTL went from 340 mg/kg to 460 mg/kg.
- (9) In the table on page 11-7, please identify the ARAR numbers as being industrial or leachability to groundwater SCTLs. Also, the word "New" is missing from a box for BaPEq.

Otherwise, the document appears to be acceptable to the Department. I concur with the protectiveness statements made in the report. If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.  
Remedial Project Manager

Mr. Art Sanford  
Draft Third 5-Year Review  
Naval Air Station Cecil Field  
September 10, 2010  
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CC: Greg Fraley, EPA Region 4  
Rob Simcik, TtNUS, Pittsburgh  
Mike Halil, CH2M Hill, Jacksonville

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