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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON REVISED DRAFT RECORD OF DECISION FOR OPERABLE UNIT 5 (OU 5)
SITE 15 BLUE 10 ORDNANCE DISPOSAL AREA NAS CECIL FIELD FL
7/17/2007
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 17, 2007

BRAC PMO SE

Attn: Mrs. Barbara Nwokike
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

RE: Revised Draft Record of Decision for Operable Unit 5, Site 15, Naval Air Station
Cecil Field, Jacksonville, Florida.

Dear Mrs. Nwokike:

I have completed my review of the Revised Draft Record of Decision for Operable Unit 5, Site 15, Naval Air Station Cecil Field, dated June 2007 (received June 8, 2007), prepared and submitted by Tetra Tech NUS, Inc. I have the following comment on the revised Draft Record of Decision:

- (1) The Land Use Controls described throughout the ROD leaves out the part of the LUC that would prohibit the excavation of soils from the site unless prior written approval is obtained from the Navy, U.S. EPA and FDEP. This restriction is very important at Site 15 because of the concentrations of contaminants in soil that will left on site as well as the aerial extent of contamination above residential or commercial/industrial SCTLs. There is also the possibility that excavated soil could meet the definition of hazardous waste.
- (2) On page 1-3, Section 1.5, last sentence, add the word "be" between the words "to" and "sufficient".
- (3) On page 2-9, second paragraph, second sentence, it says that investigations at Site 15 have identified the presence of contamination that would pose an unacceptable human health risk if the land was to be used as a high- or medium-intensity recreational area or for residential or commercial/ industrial purposes. Actually, contamination identified at Site 15 poses an unacceptable human health risk if used as a low-intensity recreational area; therefore, the requirement to remediate the site so that risks are acceptable for low-intensity recreational use.
- (4) In the table on page 2-14, the FDEP residential SCTL for BaPEqs is 0.1 mg/kg or 100 µg/kg.

- (5) On page 2-25, Section 2.11.1, last sentence, it says LUCs will prohibit groundwater use. I believe this was left in the ROD in error.
- (6) I think *A Soil Concentration Limit for Lead Based on Risk from Acute Exposure for a Small Child*, Bernard K.-M. Gadagbui, Joel G. Pounds, Ted S. Simon, and Stephen M. Rboerts, December 2002, should be added to the list of TBCs in Section 2.11.3.
- (7) I think the Risk Assessment Guidelines for Superfund related to the development of cleanup criteria based on ecological risk should also be added as either an ARAR or TBC.

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: Tim Bahr, FDEP
Doyle Brittain, USEPA, Atlanta
John Flowe, City of Jacksonville
Mark Speranza, TtNUS, Pittsburgh
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