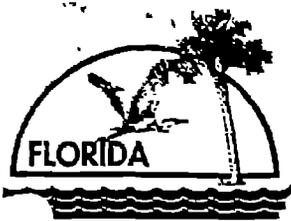


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NAS CECIL FIELD, FL  
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LETTER OF TRANSMITTAL AND FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION APPROVAL OF ALTERNATIVE PROCEDURES FOR SOIL EXCAVATION AT  
NORTH FUEL FARM AREA NAS CECIL FIELD FL  
1/23/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



KERIDIAN

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wethereil  
Secretary

January 23, 1995

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

Commanding Officer  
Mr. Bryan Kizer, Code 1842  
SOUTHNAVFACENCOM  
Post Office Box 190010  
North Charleston, SC 29419-0068

RE: Alternate Procedures and Requirements  
North Fuel Farm, Naval Air Station Cecil Field Florida  
File No. AP-STTF012

Dear Mr. Kizer:

The Department has reviewed the request for an alternate procedure to Chapter 62-775, Florida Administrative Code (F.A.C.), for the planned Initial Remedial Action at the North Fuel Farm dated December 16, 1994 (received December 22, 1994). The specific exceptions to Rule 62-775.700, F.A.C. are as follows: installing a security fence around contaminated soil processing areas; requirements to treat only soil which originates at each contaminated site; requirements to return treated soils to the original excavation; and directing leachate to the original excavation. The Department concurs with these requests and an executed copy of the Approval of Alternate Procedures is enclosed.

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 M. Brown, FDEP  
John Mitchell, FDEP Natural Resource Trustee  
Brian Cheary, FDEP Northeast District  
Bart Reedy, USEPA - Atlanta  
Jerry Young, City of Jacksonville

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

IN RE:

File No. AP-STTF012

Department of the Navy )  
Commanding Officer )  
Cecil Field Naval Air Station )  
Request Pursuant to Florida )  
Administrative Code Rule 62-775.500 )

APPROVAL OF ALTERNATE PROCEDURES

This cause comes before me upon receipt of a request by the Department of the Navy for approval of alternate procedures and requirements for the North Fuel Farm site located at Cecil Field Naval Air Station in Jacksonville, Florida pursuant to Florida Administrative Code (F.A.C.), Rule 62-775.500. A copy of the request is attached as Exhibit A.

FINDINGS OF FACT

1. The applicant requests that exceptions be granted for compliance with F.A.C., Rule 62-775.700 of the Soil Thermal Treatment Facility rule. This section describes the Specific Conditions for Mobile Facilities. The specific provisions of this section for which an exception is sought

from stockpiled soil is also directed to the oil/water separator and sanitary sewer rather than being returned to the excavation.

4. Technical evaluation of procedural considerations for removal, treatment, and disposal of soil from various sites at the base has determined that the provisions of Rule 62-775.700 for treating soil at each contamination location and returning soil to each excavation is not compatible with the expedient and cost-effective area-wide soil cleanup project. The Department of the Navy has institutional control over all areas of the Naval Air Station. The provisions of Rule 62-775.700 for fencing soil handling areas, stockpiling soil from each contamination area adjacent to the excavation, and returning soil to the original excavation were created to protect the public from adverse affects from mobile soil thermal treatment operations in public areas. The Navy contends that their ability to manage the stockpiling, treatment, and disposal of soil within the confines of the Naval Air Station provides an equivalent means of protection of the public. Staging and treating soil at central areas rather than each excavation will result in a much more expedient and efficient cleanup of the contaminated soil areas at the base. The Navy will return thermally-treated petroleum contaminated soils achieving Criteria for Clean Soils, Rule 62-775.400, back to petroleum remediation sites and will not use it as common fill at non-regulated

(hearing) on the proposed action. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 21 days of publication of this notice. A copy of the Petition must also be mailed at the time of filing to the Department of the Navy. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, F.S.

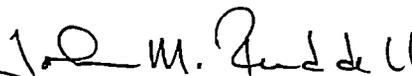
The petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner; and the county in which the subject matter or activity is located;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of facts which the petitioner contends warrant reversal or modification of the Department's action or proposed action;

Section 120.68, Florida Statutes by filing a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal, accompanied by the applicable filing fees, with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the clerk of the Department.

DONE AND ORDERED this 23<sup>rd</sup> day of January, 1995 in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



---

John M. Ruddell, Director  
Division of Waste Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400



DEPARTMENT OF THE NAVY

NAVAL AIR STATION  
CECIL FIELD, FLORIDA 32215-5000

5090  
18410.3  
16 Dec 1994

Mr. Mike Deliz  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Fl 32399-2400

BUREAU OF WASTE CLEANUP

DEC 22 1994

Dear Mr. Deliz:

TECHNICAL REVIEW SECTION

Clarification of Florida Administrative Code, (F.A.C.) 62-775, is requested as applied to the Phase I Remedial Action of the North Fuel Farm. If required we request alternate procedures be granted for the following regulations:

F.A.C. 62-775.710(2), requires "on-site" use of a mobile thermal-treatment unit. Please clarify "on-site" as related to this remediation. If "site" is defined to mean the entire station is one site, no alternate procedure is required. If "site" is defined to mean each individual contaminated area, we request approval to move excessively contaminated soil from the North Fuel Farm area to IR Site 3 for storage and treatment.

F.A.C. 62-775.710(4), requires the treated soil to be backfilled into the excavation pit from which it was removed to the extent possible, this excavation pit will be backfilled with a different type backfill. Request alternate procedure for this action.

F.A.C. 62-775.710(5) The leachate from the stockpile will not be returned to the excavation pit, but will be collected and properly disposed of in accordance with waste oil regulations if free product is recovered. If only water is recovered, it will be disposed of into the sanitary sewer. Request concurrence with this action.

Mr. Brian Kizer, Southern Division, Naval Facilities Engineering Command, requested an alternate procedures for the following actions in a separate letter:

F.A.C. 62-770.300(2), request exception to dewater this area in order to remove free product and excessively contaminated soil.

F.A.C. 62-770.300(7), request exception to remove and treatment excessively contaminated soil in excess of 1500 cubic yards.

F.A.C. 62-770.300, request exception to stockpile excavated excessively contaminated soil for greater than 30 day in the



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Building  
2600 Blair Stone Road  
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January 23, 1995

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

Commanding Officer  
Mr. Bryan Kizer, Code 1842  
SOUTHNAVFACENCOM  
Post Office Box 190010  
North Charleston, SC 29419-0068

RE: Alternate Procedures and Requirements  
North Fuel Farm, Naval Air Station Cecil Field Florida  
File No. AP-PC0068

Dear Mr. Kizer:

The Department has reviewed the request for an alternate procedure to Chapter 62-770, Florida Administrative Code (F.A.C.), for the planned Initial Remedial Action (IRA) at the North Fuel Farm dated December 16, 1994 (received December 22, 1994). The specific exceptions to Rule 62-770.300, F.A.C. are as follows: the prohibition of dewatering or groundwater table suppression during a IRA prior to approval of a Remedial Action Plan; the limitation of quantity of soil which may be excavated in an IRA to 1500 cubic yards; and the prohibition of excessively contaminated soils from being used as replacement material when conducting remedial actions. The Department concurs with these requests and an executed copy of the Approval of Alternate Procedures is enclosed.

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 M. Brown, FDEP  
John Mitchell, FDEP Natural Resource Trustee  
Brian Cheary, FDEP Northeast District  
Bart Reedy, USEPA - Atlanta

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

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION

IN RE:

File No. AP-PC0068

Department of the Navy )  
Commanding Officer )  
Cecil Field Naval Air Station )  
Request Pursuant to Florida )  
Administrative Code Rule 62-770.890 )

APPROVAL OF ALTERNATE PROCEDURES

This cause comes before me upon receipt of a request by the Department of the Navy for approval of alternate procedures and requirements for the North Fuel Farm site located at Cecil Field Naval Air Station in Jacksonville, Florida pursuant to Florida Administrative Code (F.A.C.), Rule 62-770.890. A copy of the request is attached as Exhibit A.

FINDINGS OF FACT

1. The applicant requests that exceptions be granted for compliance with F.A.C., Rule 62-770.300(2), that prohibits dewatering or groundwater table depression as an Initial Remedial Action (IRA) prior to approval of a Remedial Action Plan, and F.A.C., Rule 62-770.300(7), which limits the quantity of soil which may be excavated in an IRA activity to 1,500 cubic yards. The applicant requests that exceptions be granted for compliance with F.A.C., Rule 62-770.300(7), which prohibits excessively contaminated soils from being used as replacement material when conducting remedial actions.

the drain line are removed from the site and replaced with clean fill material, the fill material will become contaminated. This would not significantly contribute to the ultimate cleanup of the site. It is much more practical and cost effective to address the clean up of all the soil in a single cleanup strategy than to remove a portion of the soil and replace it with clean material which will become immediately contaminated. It is proposed that the excessively contaminated soil be used for backfill material following the drain line removal.

5. The Department of the Navy does not intend to apply for reimbursement from FDEP for any expenses associated with any phase of the project. Removal and remediation of the soils will be funded solely by the Department of the Navy and no reimbursement claim under either the Early Detection Incentive Program, the Abandoned Tank Restoration Program, or against any other fund of Florida public monies for cleanup cost reimbursement will be made.

Based on the information provided by the applicant, the Department finds that the applicant's request is reasonable and will provide environmental protection substantially equivalent to that provided by compliance with the requirements established in Florida Administrative Code Rule 62-770.300.

The petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner; the Department's identification number and the county in which the subject matter or activity is located;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by the petitioner, if any;
- (e) A statement of facts which the petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action;
- (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Order. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject agency proposed action

DONE AND ORDERED this 23<sup>rd</sup> day of January, 1995 in  
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
John M. Ruddell, Director  
Division of Waste Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400



DEPARTMENT OF THE NAVY

NAVAL AIR STATION  
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BUREAU OF WASTE CLEANUP

Mr. Mike Deliz  
State of Florida  
Department of Environmental Protection  
2600 Blair Stone Road  
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DEC 22 1994

Dear Mr. Deliz:

TECHNICAL REVIEW SECTION

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