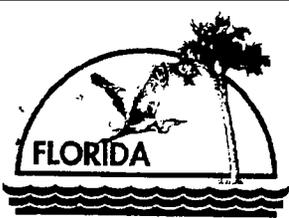


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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON SUPPLEMENTAL RESOURCE CONSERVATION AND RECOVERY ACT  
FACILITY INVESTIGATION AND REMEDIAL INVESTIGATION FOR EIGHT SITES NAS KEY  
WEST FL  
9/10/1997  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Department of Environmental Protection

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

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Virginia B. Wetherell  
Secretary

September 10, 1997

Mr. Dudley Patrick  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Dr., P. O. Box 190010  
Charleston, South Carolina 29411

RE: Supplemental RCRA Facility Investigation and Remedial  
Investigation Report for Eight Sites. Naval Air  
Station Key West, Florida

Dear Mr. Patrick:

I have reviewed the above referenced document dated June 1997 (received June 17, 1997). Overall, the report is well written and an improvement over the previous RFI report; however, the comments detailed in the following pages have to be discussed and addressed before we can consider approval of the referenced document.

## GENERAL COMMENTS

1. The document refers extensively to EPA's 1E-04 to 1E-06 target cancer risk range. Please note that the FDEP acceptable excess lifetime cancer risk is 1E-06 for the sites covered by the report. Some sites' conclusions may have to be modified to account for this fact.
2. As discussed, please note that the Department as a pre-Risk Assessment screening step compares the site's groundwater values to departmental Groundwater Guidance Concentrations to develop COPCs for consideration in the risk calculations. Likewise, in order to receive an unrestricted No Further Action, note that all wells at a site must comply with the State's Groundwater Standards and Minimum Criteria.

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**SITE SPECIFIC COMMENTS**

SWMU 4

3. I concur with the proposal of No Further Action for this site.

SWMU 5

4. I concur with the proposal for a CMS for this site.

SWMU 7

5. I concur with the proposal for a CMS for this site

IR -1

6. I concur with the recommended course of action to conduct toxicity tests on benthic species; however, I recommend such tests not be part of an engineering document such as the Feasibility Study. I am willing to explore, at our next partnering meeting, the proper CERCLA procedural step to conduct toxicity tests.

IR-3

7. The amount of soil contamination remaining post excavation is very marginal and I believe this minimal contamination does not merit the preparation of a Feasibility Study. I propose the team explore the presumptive alternative of groundwater monitoring with institutional controls of the asphalt/concrete cap at our next partnering meeting.

IR-7

8. An unrestricted No Further Action is not acceptable. I recommend that monitoring of groundwater wells located next to surface water and prevention of a residential scenario via institutional controls be explored as the course of action.

Dudley Patrick  
Page Three  
September 10, 1997

IR-8

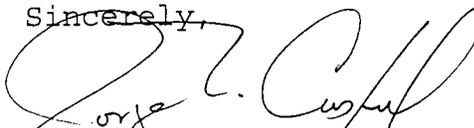
9. I concur with the recommended course of action to conduct toxicity tests on benthic species; however, I recommend such tests not be part of an engineering document such as the Feasibility Study. I am willing to explore, at our next partnering meeting, the proper CERCLA procedural step to conduct toxicity tests.

AOC B

10. The No Further Action proposal is acceptable provided that prevention of a residential scenario via institutional controls is enacted.

I look forward to discussing the above comments at the September 11, 1997 meeting. In the interim, if I can be of any assistance in this matter, please contact me at 904/488-3935.

Sincerely,



Jorge R. Caspary, P.G.

cc: Martha Berry, US EPA -Atlanta  
Phil Williams, NAS Key West  
Roy Hoekstra, Bechtel-Oak Ridge  
Charles Bryan, Brown & Root-Aiken

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