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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON
CORRECTIVE MEASURES STUDY FOR SOLID WASTE MANAGEMENT UNIT 1 NAS KEY
WEST FL
9/24/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

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TO: *Dudley Patrick / Chuck Bryan*
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FROM: *Jorge R. Caspari*

DATE: *9/24/97*

NUMBER OF PAGES (including cover): *3*

MESSAGES:

CMS Comments. I will be out of the office Th. - Friday. Regards, Jorge.

TO: Dudley Patrick, SOUTH DIV
Chuck Bryan, B & R-Aiken

FROM: Jorge R. Caspary, NAS KW Project Manager *JRC.*

DATE: 9/24/97

SUBJECT: SWMU 1 CMS Draft Comments

As promised, here are my comments on the above referenced document. I look forward to discussing them next week.

1. The CMS is an engineering document. The final revision should be signed and sealed by a State of Florida registered engineer with responsible charge for its preparation.
2. Provide a land-use map which shows the location of the residential scenario outside of the SWMU.
3. Alternative 2 assumes that sediments are not RCRA hazardous wastes by listing or characteristic. The Navy must insure that all portions of the RCRA HSWA process are addressed before selecting an alternative. Make this very clear in the report.
4. The economic comparative analysis for Alternative 2 considers the expense of the Interim Action at SWMU 1 as a "sunk cost". This may inadvertently misrepresent the true cost of this alternative. I suggest you explore the following method: use the actual capital costs of the IRA amortized at current government borrowing rate over the projected life of the alternative (30 yrs under RCRA permit requirements). This approach assumes 100% utilization of the previous and current SOUTH DIV budget for NAS Key West; otherwise, the money spent on the IRA will indeed represent a "sunk cost".
5. Discuss briefly the DQO levels achieved for data (for all media) and any significant validation issues faced by both Brown & Root and Bechtel.
6. A very important fact is that groundwater is impacted with Vinyl Chloride, a DEP Primary Standard. Any calculations done to estimate the volume of affected groundwater?
7. Since RCRA rules the process at this site, need to estimate the time frame to reduce VC to MCLs which is the ONLY criteria considered by RCRA for clean closure of the site (equivalent to a No Further Action).

DRAFT MEMORANDUM
September 24, 1997
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8. Based on the model results, it appears that a VC groundwater concentration of 116 ug/L at the site is protective of groundwater at the residential well. This level according to the text is based in "that soil in the source area was remediated" Please be more specific, has all the source area been remediated? If any remains, were VC and metals TCLP analysis done on soil?

9. State that the costs estimates are for comparative purposes, however, I'm under the impression they are incomplete. You should try to also estimate the RCRA requirements portion of the process that is, permit modifications for clean closure, RCRA reporting requirements, contingency fees for handling these and anything else that will carry the site for RCRA closure and eventual permit deletion. This will provide SDIV managers with a more complete picture of what it takes to achieve closure of the site.

10. I suggest you spend some text on the fact that while the site's gw exceed ARARs, advection, diffusion, and dispersion in combination with your model indicate that there is no foreseeable threat to residents from the gw.

11. I'm under the impression that EPA's equations are only valid for soils with TOC content greater than 0.1%. The soils in KW may have TOC levels lower than 0.1% thus resulting in Kd values different than those of Table 1 page 11 of Appendix B. Make sure you utilize actual TOC values or clarify that the obtained values are estimates only.

12. Alternative No. 2 implies that groundwater, with proper institutional controls, will undergo natural attenuation to reach MCLs, however, I'm under the impression that to date no site specific and focused assessment confirming natural attenuation or intrinsic remediation has been performed and, therefore, are not presented in the document. Reasonable estimates to achieve MCLs will have to be computed in order to comply with applicable State and Federal requirements. Unless the NPV of Alternative 2 includes such calculations you may want to consider computing the NPV of alternatives that include intrinsic bioremediation vs. more active gw remediation. Remember, groundwater in spite of being classified as Class III still IS an important part of this site (more so with people accessing it down the road) and current statutes do not provide the Navy with much relief for waivers and such.