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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON PROPOSED PLANS FOR ELEVEN BASE REALIGNMENT AND CLOSURE
SITES NAS KEY WEST FL
7/7/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

RECEIVED
7-16-99
July 7, 1999

Mr. Dudley Patrick
Code 1858
SOUTHDIV
2155 Eagle Drive
North Charleston, South Carolina 29406

RE: Proposed Plans for Eleven BRAC Sites. NAS Key West,
Florida

Dear Mr. Patrick:

I have completed the review of the above referenced document dated June 1999 (received June 22, 1999) and have the following comments.

1. Truman Annex DRMO Area and others throughout this deliverable, Proposed Remedy: suggest changing the language of the proposed remedy from "no remedial action beyond that done in the IRA" to: "No Remedial Action with Institutional Controls".
2. Facility Background, second paragraph, fourth line and others throughout the deliverable: specify whose action levels were exceeded: EPA's, FDEP Bronwfields, the NAS Key West Team's?
3. Page 2 of 2, first paragraph: once again, specify whose action levels were not exceeded. Also, be specific as to what type of Institutional Controls are recommended or being proposed
4. Truman Annex Building 103, Page 2 of 2, first paragraph: Specify where and at what depths is contaminated soil still present.
5. Same page and paragraph: I am unclear as to what "degree of engineering controls" means. It would be better to explain that exposure to contaminated soils is being reduced by the slab, asphalt, etc.

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

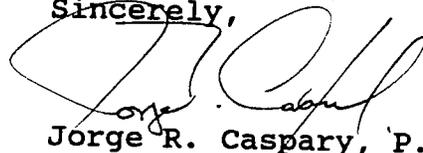
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Mr. Dudley Patrick
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6. Same page and Paragraph: specify what type of institutional/land use controls are being proposed.
7. Building 223, Page 1 of 2 and 2 of 2: the proposed remedy is "no remedial action", however, institutional controls are not contemplated in spite of arsenic remaining in excess of its action level at two locations (no depths are mentioned).
8. If no ICs are being proposed, expand the reasoning from a exposure rather than a "degree of engineering controls" perspective. For instance, is the 95% UCL of an exposure action level being met at a specific depth? What is that depth?
9. Truman Annex Building 102 and 104: this proposed plan does a much better job of explaining that ICs are not needed because the 95% UCL of a soil action level is being met. However, please explain elsewhere on this deliverable what does the "95% confidence level" means. The public and the LRA need to understand all the technical terms being presented.

In order to avoid redundancy of comments, please check all the proposed plans for comments presented herein and that may be applicable. If I can be of any assistance in this matter, please contact me at 904/488-3935.

Sincerely,



Jorge R. Caspary, P.G.

cc: Chuck Bryan, TTNUS Aiken
Ron Demes, NAS Key West
Turpin Ballard, EPA-Atlanta

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