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LETTER REGARDING FLORIDA PUBLIC EMPLOYEES FOR ENVIRONMENTAL  
RESPONSIBILITY COMMENT ON ENGINEERING EVALUATION/COST ANALYSIS FOR  
FORMER DEFENSE REUTILIZATION MARKETING OFFICE LAND SLIVERS NAS KEY WEST  
FL  
05/18/2012  
FLORIDA PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY



Public Employees for Environmental Responsibility

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May 18, 2012

Mr. Dana Hayworth  
Attn: Amy Twitty  
1766 Sea Lark Lane  
Navarre, Florida 32566

Via Email: [Dana.Hayworth@navy.mil](mailto:Dana.Hayworth@navy.mil)  
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&  
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**Re:Engineering Evaluation/Cost Analysis for Former DRMO Land Slivers Naval Air  
Station Key West**

Dear Mr. Hayworth:

In response to the May 4, 2012 public notice regarding soil remediation for lead, arsenic PAHs etc. we have the following questions.

1. Section 2.2, Previous Investigations, notes that soil was excavated within the land sliver in 1999. Inasmuch as this area is listed in the National Registry of Historic Sites, has coordination with the State's Historic Preservation Office and approval letters been obtained for each aspect of this site cleanup? How may we obtain copies?
2. It appears that numerous soil excavations have taken place in and around the DRMO area as a result of the Base Realignment and Closure activities. In this instance, the Navy is proposing an EE/CA type removal only for these land slivers; however, Section 2.2 notes that 12,000 cubic yards of contaminated soil was excavated from January 11 to April 16, 1999 that included both land slivers. If soil was already removed from this area, why is more soil being removed, what is the correlation between this removal and past removals and the CERCLA cleanup methods?

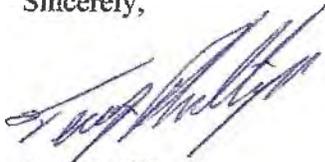
Section 2.3.4, Potential Migratory Pathways notes that "no groundwater contamination was identified that was associated with the DRMO operations" and that SPLP sampling data supports the same conclusion. What is the depth to groundwater in this area?

Section 2.3.5, Potential Receptors, mentions an 8-inch water main running the length of this area on the south land sliver. If it does, we have the following questions:

- a. When was this line installed in relationship to the 1999 excavation and the current planned excavation?
- b. What is the impact from the contamination to the line and how was this determined?
- c. What area and number of people does this line provide potable water?
- d. How can we obtain water quality data from the date the line was installed to present?
- e. What approvals were obtained from the Navy?
- f. Who installed the line and is there construction details and other documentation?
- g. What pre- and post-soil and groundwater sampling was conducted during line installation and where can we obtain the result?
- h. How is the water line being managed with respect to insuring public health and safety?
- i. Are tap-water samples being taken now that are representative of the type of contamination that is being excavated?
- j. Have any reported leaks, damage or repairs occurred since the line was installed?
- k. Are there reports or other information that would support how this line has been maintained and where can these be obtained?

Any assistance that you can provide with respect to the above questions would be most appreciated.

Sincerely,



Jerry Phillips  
Director, *Florida* PEER