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NAS CECIL FIELD
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT FEASIBILITY STUDY OPERABLE UNIT 2 (OU2)
DECEMBER 1994 NAS CECIL FIELD FL
1/9/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Virginia B. Wetherell
Secretary

January 9, 1995

Mr. Steve Wilson
Department of the Navy
Southern Division
Naval Facilities Engineering Command
Code 1865
P.O. Box 190010
Charleston, South Carolina 29411-9010

Re: NAS Cecil Field Superfund Site

1. Draft *Feasibility Study, Operable Unit 2*, December, 1994

Dear Mr. Wilson:

We have reviewed the above referenced document and provide the following comments.

1. Section 3.2.1 (Conclusions of Ecological Assessment Summary)

As stated in our previous comment No. 7 for the Remedial Investigation for OU 2, we disagree that future groundwater discharge to the drainage ditch does not pose any ecological risk. Certain areas of the ditch sediment were shown to be toxic to benthic organisms. If the sediment was remediated, continued discharge of contaminated groundwater through the sediment into the ditch would continue to contaminate the sediment via absorption. As the groundwater poses a risk for continued contamination of the sediment, it therefore poses a risk to the benthic community. It is also possible that the porewater of the sediment provides ecological risk.

2. Section 8.2 (Comparison Analysis of Sediment Alternatives)

In Table 8-1, under the Short-term Effectiveness criterion for environmental effects from Alternative SD-1 (No Action), it states "no adverse environmental effects would be caused." This is true in that active remedial

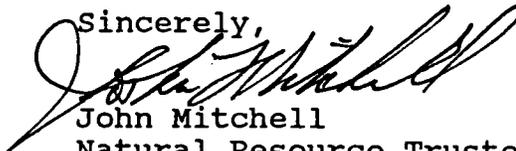
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action would cause environmental impacts. However, no action leaves on-going environmental effects to the benthic community. This should also be noted under this portion of the Table.

Also, we disagree that Alternative GW-2 (Natural Attenuation) is totally protective of the environment based upon our reasoning in comment No. 1.

We appreciate the opportunity to be involved in the investigation and remediation plans at NAS Cecil Field. Please keep us informed of all remedial investigations and activities at the station. Should you have any questions, please contact me at (904) 487-2231.

Sincerely,



John Mitchell
Natural Resource Trustee Project
Manager, Office of
Intergovernmental Programs

cc: Pat Kingcade, FDEP
Eric Nuzie, FDEP
Jim Lee, DOI
Waynon Johnson, NOAA
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