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NAS CECIL FIELD  
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING REVIEW OF DRAFT PROPOSED PLAN FOR REMEDIAL  
ACTION OPERABLE UNIT 2 (OU2) SITES 5 AND 17 NAS CECIL FIELD FL  
7/22/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## Memorandum

# Florida Department of Environmental Protection

**TO:** Mike Deliz, P.G., Remedial Project Manager,  
Technical Review Section

**THROUGH:** Tim Bahr, P.G., Supervisor, Technical Review Section

**FROM:** Greg Brown, P.E., Professional Engineer II,  
Technical Review Section

**DATE:** June 22, 1995

**SUBJECT:** Draft Proposed Plan for Remedial Action at OU2, Site  
5 and Site 17, NAS Cecil Field, Jacksonville,  
Florida.

JRC.  
for TB.

HB

I reviewed the subject document dated June 1995 (received June 19, 1995). I have the following comments:

1. The Proposed Plan should describe for the public how the "ongoing" Interim Remedial Actions relate to the proposed final solutions at these sites. This could be easily accomplished by presenting the vital statistics (including costs) for the selected interim remedies presented in Tables 2 of the Site 5 and Site 17 Proposed Plans for IRAs (dated August 1994).
2. Section 2.0, page 3: "Depending on the success of these plans, future use of OU 2 would remain undeveloped for recreation".

Temporary land-use restrictions, particularly relating to groundwater use, should be part of the proposed plan until risks to human health and the environment are reduced to acceptable levels.

3. Section 2.0, Baseline Risk Assessment, page 7. The last paragraph of this section explains why apparent risks due to inorganic contaminants in groundwater are not considered in this proposed plan. It would be prudent of the Navy to collect the proposed groundwater samples soon so as to finally resolve this issue.
4. Section 2.0, Feasibility Study, page 7. The Department has not seen, reviewed, or approved the June 1995 version of the FS. It is premature to present a proposed plan to the public before regulatory approval of planning documents are obtained.
5. Alternative GW-6 proposes use of an "in-situ Air Stripping Well". This was not described as an alternative in the

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**Mike Deliz, P.G.**

**June 22, 1995**

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earlier FS dated December 1994. This is an innovative technology that offers potentially significant advantages for site remediation. It's success, however, is dependent on having a good understanding of site-specific conditions. I am not sure if there is enough data to confidently specify this technology at this site with the certainty that it will be both effective and protective. I suggest that additional site-specific hydrologic studies be conducted, particularly a pumping test, before committing to this technology wholeheartedly.

6. The Proposed Plan makes geologic and engineering representations that the public will use to assess the acceptability of the recommended remedial actions. Public confidence in the recommendations would be enhanced if the Navy's responsible professionals provide signed and sealed signature pages in the Proposed Plan. This would indicate that appropriate duty of care and professional standards were applied during formulation of the Proposed Plan's conclusions and recommendations, and this could improve their credibility in the public's view. This precedence has been made at NAS Pensacola where the Navy's responsible professionals provided signature pages in a recent proposed plan.