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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 1 (OU1) NAS  
CECIL FIELD FL  
5/3/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Memorandum

To: Eric Nuzie  
Federal Facilities Coordinator

From: Bill Neimes *wn*  
Engineering Support Section

Date: May 3, 1994

Subject: Draft Feasibility Study  
NAS Cecil Field  
OU 1

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I have reviewed the subject document which outline some of the possible alternatives used to remediate Operable Unit 1. Operable Unit 1 consists of two closed solid waste landfills. Along with this document, there are two other documents which address the remedial investigation (Draft Remedial Investigation) and risk assessment (Draft Baseline Risk Assessment) for this operable unit. Due to time constraints, I only used these documents as reference documents.

This draft feasibility study divides the remedial alternatives into either: (a) source control or (b) risk reduction. The source control alternatives address site closure of the two landfills. The risk reduction alternatives address the reduction of risks to ecological receptors.

I have included comments related to this document:

1. Since this involves the closure of two solid waste landfills, I believe that the Department review should include someone from the solid waste section to assure us that the landfills are closed in accordance with the all the applicable solid waste regulations (Chapter 17-701, F.A.C.).
2. The text selects Alternative SC-2 as the recommended alternative for source control. If a cap is not required for closure of the landfills, I agree that this alternative is the most appropriate and should be the selected alternative.

It appears that the preferred alternative for risk reduction is to implement alternative RR-1 (monitoring). However, if after a certain period of time, adverse environmental effects are still noted, than Alternative RR-3 could be implemented.

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I don't agree with this strategy for the following reasons. First of all, it is known from the baseline risk assessment that some of the sediments are toxic to the benthic community. Additionally, it appears that this toxicity is associated with either the inorganics found at the site or the toxicity may be associated with an orange-red flocculent material (an inorganic) that blankets the bottom of the tributary. In either case, the toxic material in the sediments is most likely an inorganic material which will remain toxic to the benthic community for an indefinite period of time. Because the toxic material is an inorganic material, I don't believe that the toxicity at this site will change during a proposed monitoring period of 5 years. Implementing this monitoring period to monitor the change in environmental effects may not accomplish anything.

3. Additional recommendations for the investigation of certain areas of the operable unit is included on page 2-18 and 2-19. Most of this investigation includes the sampling of surface water and sediments within the wetland area. I agree that this sampling should be done to supplement the Draft Remedial Investigation.

4. I could not understand how the text could list on Table 3-1 the human health contaminants of potential concern whereas some of these contaminants were not even identified during the sampling events. (The tables in Chapter 2 summarize the sampling events.) For example, for the surface water samples, Table 3-1 includes both acetone and chloroform as contaminants of potential concern, yet the only two VOC's detected in the surface waters were chlorobenzene and toluene (see Table 2-4). Therefore, how could acetone and chloroform be contaminants of potential concern when they were not even identified in the samples?

5. This document extracts language from the Baseline Risk Assessment which states that although the unfiltered surficial ground water include an unacceptable noncancer risk (HI=2) and borderline acceptable cancer risk ( $1 \times 10^{-4}$ ), these risks are not site related and do not represent unacceptable risk to human health and the environment. Our toxicologist should determine whether this is an accurate statement.

cc: Mike Deliz - BWC