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NAS KEY WEST
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REQUEST FOR MODIFICATIONS TO FINAL CORRECTIVE MEASURES STUDY REPORTS
FOR SOLID WASTE MANAGEMENT UNITS 5 AND 7 NAS KEY WEST FL
10/22/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of
Environmental Protection

NO. 694 P. 1/4

7593-0048
7046-3.1 IC

Lawton Chiles
Governor

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

Virginia B. Wechsell
Secretary

0048 IC

FACSIMILE

FEDERAL FACILITIES PROJECTS AND COORDINATION
904-488-3935

TO: C. BRYAN / D. PATRICK / M. BARRY / R. DOMAS

FROM: J. CASPARY

DATE: 10/22/98

NUMBER OF PAGES (including cover): 4

MESSAGES: Request the following modifications to go Final on
the CMSs for SWNUA 5 & 7.

Any questions, give me a call.

TO: NAS KEY WEST TEAM
FROM: Jorge R. Caspary, FDEP
SUBJECT: Language change to CMS for SWMUs 7 and 7
DATE: October 22, 1998

Pardners:

I have re-reviewed the CMS for both SWMUs and have the following recommended changes:

SWMU 5, page 6-4:

The recommended alternative for this site is **Alternative 2: *Institutional Controls with monitoring***. Under this alternative groundwater, sediment, and surface water would be sampled and analyzed at a frequency to be determined by the NAS Key West Team. Further, exposure to soil in the adjacent berm would be managed by implementing appropriate access restrictions to affected soil in said berm. The institutional control alternative is further described below.

Copy Paragraphs 2 and 3 of my faxed sheet

Once you copy both paragraphs, replace the "no further action" words in paragraph No. 4 with:

the proposed alternative "*institutional controls with monitoring*" is protective of human health and environment... and copy the rest of the paragraph as is.

This is all that is needed in the CMS for SWMU No. 5 s. When we review the LUCIPs, we may have to add to the one for SWMU 5 language indicating that the berm be mowed once every other month.

SWMU 7
Page 6-6

Modify this page as follows:

The recommended alternative for this site is Alternative 2- *Institutional Controls with monitoring*. Under this alternative groundwater, sediment, and surface water would be sampled and analyzed at a frequency yet-to-be determined by the NAS Key West Team. Further, exposure to soils in areas not removed by the Interim Removal Action would be managed by implementing appropriate access restrictions. The institutional control alternative is further described below.

Copy Paragraphs 2 and 3 of my faxed sheet

Once you copy both paragraphs, replace the "no further action" words in paragraph No. 4 with:

the proposed alternative "*institutional controls with monitoring*" is protective of human health and environment... and copy the rest of the paragraph as is.

This is all that is needed in the CMS for SWMU No. 7. When we review the LUCIPs, we may have to add language indicating that appropriate signs will be installed to prevent exposure of personnel to the soils in the affected areas.

Please call me if you have any questions.

groundwater monitoring data will be used to determine if there are significant changes in chemical levels that could potentially impact human health and the environment over time.

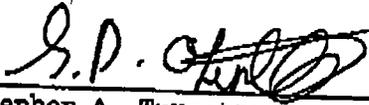
1.4 DECLARATION STATEMENT. It has been determined by the Navy, USEPA, and FDEP that No Further Action with a five-year review is necessary at OU 2. In addition, PSCs 41, 42, and 43 will require postclosure groundwater monitoring under the RCRA for 2 to 3 years.

By separate Memorandum of Agreement (MOA) with the USEPA and the FDEP, NAS Jacksonville, on behalf of the Department of the Navy, agreed to implement basewide certain periodic site inspection, condition certification, and agency notification procedures designed to ensure the maintenance by Station personnel of any site-specific land-use controls (LUCs) deemed necessary for future protection of human health and the environment. A fundamental premise underlying execution of that agreement was that through the Navy's substantial good-faith compliance with the procedures called for therein, reasonable assurances would be provided to the USEPA and FDEP as to the permanency of those remedies, which included the use of specific LUCs.

Although the terms and conditions of the MOA are not specifically incorporated herein by reference, it is understood and agreed by the Navy, USEPA, and FDEP that the contemplated permanence of the remedy reflected herein shall be dependent upon the Station's substantial good-faith compliance with the specific LUC maintenance commitments reflected therein. Should such compliance not occur or should the MOA be terminated, it is understood that the protectiveness of the remedy concurred in may be reconsidered and that additional measures may need to be taken to adequately ensure necessary future protection of human health and the Environment.

The "no further cleanup action" with groundwater monitoring is protective of human health and the environment under current industrial land use, complies with State and Federal applicable or relevant and appropriate requirements (ARARs), and is cost effective.

1.5 SIGNATURE AND SUPPORT AGENCY ACCEPTANCE OF THE REMEDY.



Captain Stephen A. Turcotte
Commanding Officer, NAS Jacksonville

20 Oct 98
Date