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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING SOIL AND GROUNDWATER ASSESSMENT LETTER REPORT
BOCA-CHICA VALVE BRAVO TAXI WAY AND RUNWAY #7NAS KEY WEST FL
3/16/2010
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 16, 2010

Mr. Dana Hayworth, P.G.
Department of the Navy
Naval Facilities Engineering Command Southeast
Building 135, Ajax Street
Naval Air Station Jacksonville
Jacksonville Florida, 32212

Re: Soil and Groundwater Assessment Letter Report, Naval Air Station Key West-Boca Chica, Valve Vaults Bravo Taxi Way and Runway #7, Naval Air Station Key West, Florida

Dear Mr. Hayworth:

The Department has completed the technical review of the above referenced document dated November 20, 2009 (received January 8, 2010 via email) and has the following comments:

1. **General Comment:** The Department would like to recommend that the name for this site be established as, "Boca Chica Bravo Valve Pit and Runway #7 Valve Pit.
2. **Page 3, Groundwater and Data Summary, 1st paragraph:** Per 62-770, Petroleum Contamination Site Cleanup Criteria and 62-762, Above Ground Storage Tank Systems of the Florida Administrative Code (F.A.C.), the groundwater sampling method used is not correct. Sampling the groundwater in an open valve pit is not going to provide the correct analytical data to determine if groundwater contamination is present at this site. The Department requires that monitoring wells be installed in these source areas to determine if groundwater contamination is an issue.
3. **Page 3, Groundwater and Data Summary, 2nd and 3rd paragraphs:** Although the groundwater data collected in the open pit is not valid, the Department still requires the findings still to be addressed. The Department requires that the groundwater be sampled for the laboratory methods listed in 62-770 F.A.C., Table C entitled, "For used oil, for identified products not listed in the Gasoline or Kerosene Analytical Groups, and for products for which the specific identity is unknown". The Department's rationale behind this request is threefold:
 - a. Even though the groundwater was not correctly sampled by CEI, the Navy is still required to determine if the petroleum and chlorinated solvent contaminants are not in the groundwater and soil at this site.

- b. Per the email provided by NAS Key West on March 1, 2010, Malcolm Pirnie (United States Navy Unexploded Ordinance Contractor) the Bravo Valve Pit may be co-located adjacent to a former Rocket Launch Pad and Jet Engine Test Facility in the early 1960's. This former site could be a possible source for the chlorinated solvents found at this site.
 - c. Regardless of whether or not this site is an Environmental Restoration, Navy (ER,N) or a Non ER,N site the contamination at this site will need to be fully assessed and remediated by N.A.S. Key West.
4. **Page 6, Conclusions:** The Department does not concur with 1st conclusion listed in this section. CEI will need to correctly install monitoring wells and sample the groundwater at these sites prior to determining the correct path forward for this site.

If I can be of any further assistance with this matter, please contact me at (850) 245-8998.

Sincerely



Tracie Lynn Bolanos
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

cc: Mr. Robert Courtright, Naval Air Station Key West, Key West, Florida
Ms. Amy Twitty, CH2M Hill, Navarre Beach, Florida
Mr. Frank Nemeck, South District Office, Fort Meyers, Florida

 JJC  ESN