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NAS CECIL FIELD, FL
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT LONG TERM
MONITORING PLAN FOR OPERABLE UNIT 10 (OU 10) SITE 21 AND SITE 25 AND
OPERABLE UNIT 11 (OU 11) SITE 45 NAS CECIL FIELD FL

5/6/2002

U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

61 Forsyth Street, SW
Atlanta, Georgia 30303

May 6, 2002

4WD/FFB

Commander
Department of the Navy
SOUTHNAVFACENGCOM
Attn: Mr. Mark Davidson
Mail Code ES339
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Subject: Draft Long-Term Monitoring Plan, April 2002
Operable Unit 10, Sites 21 and 25 and Operable Unit 11, Site 45,
Naval Air Station, Cecil Field, Jacksonville, Florida

Dear Mr. Davidson:

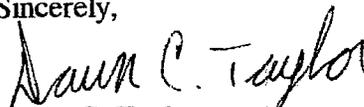
The U.S. Environmental Protection Agency (EPA) has completed its review of the subject document, herein termed the LTM Plan. Comments on this document were provided by William O'Steen (EPA, Office of Technical Services) and Fred Sloan (EPA, Science and Ecosystem Support Division). EPA's comments are as follows:

1. Figure 1-7 needs to indicate the sample date(s) for monitoring wells that have been sampled once.
2. The second paragraph of Section 2.1 discusses obtaining Site 45 ground-water samples for vanadium analysis using a 1-micron filter. At this time, EPA Region 4 does not consider field-filtered samples as generally acceptable for baseline risk assessment purposes. The same statement can probably be made for Florida's position on using filtered samples for risk assessment, although Chapter (2-520.300(9) FAC references a state technical document that does allow for use of field-filtered samples for assessment purposes provided a set of specific criteria are met. If the Florida DEP criteria set forth in the document "Determining Representative Ground Water Samples, Filtered or Unfiltered" (Florida DEP, 1994, <http://www.dep.state.fl.us/water/groundwater/pubs.htm>.) have been fully met, then the LTM Plan needs to state this is the case as support for evaluating field-filtered samples. If the criteria in the referenced document have not been met, then either (1) unfiltered data must be considered in the long-term monitoring and thus the wording in the last sentence of the second paragraph of Section 2.1 either needs to be changed to eliminate the reference to filtered samples or to refer to unfiltered samples or (2) the referenced part of the LTM Plan needs to state that both unfiltered and field-filtered samples will be obtained.

3. Table 2-1 presents the construction data for only the subset of monitoring wells that are proposed for sampling during long-term monitoring. Either the remainder of the wells at the three sites need to be included in this table or the table should be retitled so that it more clearly specifies the wells listed in the table are only those proposed for the long-term monitoring.
4. Well CEF-P21-GW-01S shown on Figure 1-3 should have consistent nomenclature with well CEF-P21-01S in Table 2-2 and Figure 2-1.
5. Considering the water-level data shown in the appendix to the LTM Plan, monitoring CEF-081-02S as the well downgradient of the presumed BHC plume is questionable, because the apparent direction of ground-water flow is probably more to the east in that area. Figure 2-2 shows a presumed BHC plume boundary only a short distance upgradient of CEF-081-02S but there are no data presented in the LTM Plan that indicate this plume configuration is anything more than a speculative interpretation. Unless there are some data that provide evidence that CEF-081-02S is actually downgradient of an area of BHC ground-water contamination, there needs to be another shallow well located more directly downgradient of CEF-P25-01S to provide the downgradient monitoring function. *OK not to put in well, but mon 3S instead*
6. For monitoring the potential migration of contamination downgradient of the Site 45 vanadium plume, there may be some benefit to including one of the wells shown on Figure 2-3 that is closer to and more directly to the south of the interpreted plume boundary. This comment is made because the potentiometric surface data shown on Figure A-3 suggest a more southerly component of ground-water flow in part of the presumed area of ground-water contamination; also, there are wells that may be downgradient of and are closer to the plume margin than CEF-P45-13S and therefore these wells could be as or more appropriate than CEF-P45-13S for evaluating potential plume expansion. *we will keep 8S*

If you have any questions, please contact me at (404) 562-8575 or taylor.dawn@epa.gov.

Sincerely,



Dawn C. Taylor
Remedial Project Manager

cc: David Grabka, FDEP
Scott Glass, SOUTHDIV
Mark Speranza, TTNUS
Sam Ross, J.A. Jones