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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW OF DRAFT OPERATING PROPERLY AND SUCCESSFULLY DEMONSTRATION
REPORT FOR OPERABLE UNIT 9 (OU 9) SITE 57 NAS CECIL FIELD FL
8/8/2005
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

August 8, 2005

Commanding Officer
Mr. Mark Davidson, Code ES33
SOUTHNAVFACENGCOM
Post Office Box 190010
North Charleston, SC 29419-9010

RE: Draft Operating Properly and Successfully Demonstration
Report for Operable Unit 9, Site 57, Naval Air Station Cecil
Field, Florida.

Dear Mr. Davidson:

I have reviewed the Draft Operating Properly and Successfully Demonstration Report for Operable Unit 9, Site 57, Naval Air Station Cecil Field, dated November 2004 (received December 1, 2004). As the Department does not have regulatory authority to make a final determination on Operating Properly and Successfully (OPS) and does not have guidance as to what information or level of confidence is required to support an OPS determination, I am giving you my general comments on what is presented in the report and my thoughts as to whether the selected remedy, natural attenuation, groundwater monitoring and land use controls preventing exposure to or consumption of groundwater and maintaining the integrity of the groundwater monitoring wells, are operating as designed and are protective of human health and the environment.

I did not find the information presented in the report to be sufficiently convincing that the selected remedy for this site is operating successfully. While groundwater monitoring reports have indicated that contamination has not migrated past sentinel wells and that the plume appears stable, contaminant concentrations have shown no appreciable and consistent trend downwards that would indicate that significant natural attenuation is taking place. On the other hand, the Record of Decision for Site 57 estimates that 18 years may be necessary for natural attenuation to reduce groundwater contaminant concentrations to levels below groundwater cleanup target levels. With this extended time frame, there may not yet be enough groundwater analytical data collected to make out a trend of decreasing contaminant concentrations. However, the final decision on the transferability of this site rests on EPA's determination that the selected remedy for this site is Operating

"More Protection, Less Process"

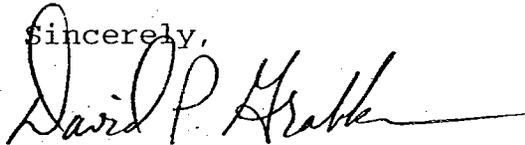
Mr. Mark Davidson
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Properly and Successfully. I have the following additional comments on the report:

- (1) There was no discussion of sentinel wells CEF-824A-19S and CEF-824A-20S, which should be used to demonstrate whether the contaminant plume's boundary appears stable, is expanding, or is shrinking.
- (2) It has been speculated that the low pH values that have been recorded for groundwater in the shallow and intermediate surficial aquifer may be limiting natural attenuation processes. Please discuss this in the part of the report that describes natural attenuation.

If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager

CC: Tim Bahr, FDEP
Doyle Brittain, USEP, Atlanta
John Flowe, City of Jacksonville
Mark Speranza, TtNUS, Pittsburgh
Mike Halil, CH2M Hill, Jacksonville
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