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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW OF FIRST QUARTER 2005 OPERATIONS AND MAINTENANCE STATUS REPORT
FOR NUTRIENT INJECTION SYSTEM AT BUILDING 46 NAS CECIL FIELD FL
10/12/2005
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

RAC BOA

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

October 12, 2005

Mr. Gabe Magwood
Code ES24 (UST RPM)
Southern Division
Naval Facilities Engineering Command
Post Office Box 190010
North Charleston, South Carolina 29419-9010

RE: First Quarter 2005 Operation and Maintenance Status Reports,
January 1, 2005 - March 31, 2005, Nutrient Injection System,
Building 46, Naval Air Station Cecil Field, Jacksonville,
Florida

Dear Mr. Magwood:

I have completed my review of the First Quarter 2005 Operation and Maintenance Status Reports, January 1, 2005 - March 31, 2005, Nutrient Injection System, Building 46, Naval Air Station Cecil Field, dated July 2005 (received August 8, 2005), prepared and submitted by Terraine, Inc. While the report adequately describes the groundwater monitoring effort that is being conducted in conjunction with the operation of the nutrient injection system, I continue to feel that the time is right to reevaluate the remediation system and the soil and groundwater monitoring plan.

The Remedial Action Plan Addendum was approved by the Department on July 31, 2000. After remedy implementation, it became apparent that the groundwater contaminant plume had not been adequately delineated and that the remediation system may need to be extended. In a May 28, 2003 Supplemental Assessment Letter Report, Tetra Tech verified that the groundwater plume extended further to the south of monitoring well CEF-46-26I. However, groundwater monitoring in accordance with the approved Remediation Action Plan Addendum has only extended to monitoring well CEF-46-26I, without any of the later Tetra Tech wells having been subsequently sampled. Also, the remediation system has not been extended to cover the southernmost portion of the plume.

Over five years have past since the Remedial Action Plan Approval Order was issued. Soil contaminant concentrations at three locations exceed leachability-based soil cleanup target

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levels. Concentrations of contaminants in groundwater still exceed the Natural Attenuation Default Concentrations in Table V of Chapter 62-777, Florida Administrative Code, in some monitoring wells. For these reasons, I request that the remediation system and the soil and groundwater monitoring plan be thoroughly evaluated to (1) determine the continued effectiveness of the remediation system and whether the system needs to be extended, modified, optimized or discontinued; and (2) determine whether the soil and groundwater monitoring plans continue to meet regulatory requirements. I also request that a complete round of groundwater monitoring, including all monitoring wells located on site as well as any additional wells deemed necessary to install, be conducted in conjunction with the evaluation of remedial actions conducted thus far.

If you have any questions concerning this letter or I can be of any further assistance with this matter, please contact me at (850) 245-8997.

Sincerely,



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

cc: Mark Davidson, SouthDiv
Jim Young, Terraine, Inc.
Doyle Brittain, USEPA Region 4
Mike Fitzsimmons, FDEP Northeast District
Mark Speranza, Tetra Tech NUS, Pittsburgh
Mike Halil, CH2M Hill, Jacksonville

JJC



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