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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON FOURTH QUARTER GROUNDWATER MONITORING AND OPERATION
AND MAINTENANCE REPORT FOR DECEMBER 2009 FOR BUILDING 46 NAS CECIL FIELD
FL
07/13/2010
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

July 13, 2009

BRAC PMO SE
Attn: Mr. Art Sanford
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

RE: Fourth Quarter Groundwater Monitoring and Operation & Maintenance Report, December 2009, Building 46, Former Naval Air Station Cecil Field, Jacksonville, Florida.

Dear Mr. Sanford:

I have completed my review of the Fourth Quarter Groundwater Monitoring and Operation & Maintenance Report, December 2009, Building 46, Former Naval Air Station Cecil Field, dated May 11, 2010 (received May 17, 2010), prepared and submitted by Solutions - IES, Inc. I have the following comments on the report:

- (1) In Sections 1.0 and 6.0 of the report, it states that a decision was made during the November 2009 BCT meeting that results from the first, second and third quarter groundwater monitoring events would be presented at BCT meetings and that only the fourth quarter monitoring results would continue to be submitted in a formal report. This is incorrect. What was decided at that meeting is that only an Annual Report would be required by the Department consistent with Chapters 62-770 and 62-780, Florida Administrative Code. The Annual Report would submit the groundwater monitoring data collected throughout the year, all four quarters in the case of Building 46, and would discuss the trends in that data and makes recommendations for further site work based on the data collected over the year. The Fourth Quarter Groundwater Monitoring Report does not meet the requirements for an annual report. However, as the First and Second Quarter Groundwater Monitoring Reports were formally submitted and approved by the Department, only the Third Quarter Groundwater Monitoring Report and its relevant data is missing. Either the Navy can submit a Third Quarter Groundwater Monitoring Report for the site and begin submission of Annual Reports next year, or the Navy could submit an Annual Report this year containing the third quarter data (including the lab reports, groundwater sampling logs, chain of custody, groundwater flow direction figure, plume

configuration figure, etc.) and referencing and summarizing the results of the first, second and fourth quarter reports and making an end of the year recommendation for future site work.

- (2) In Section 6.0, Solutions-IES recommends removing well CEF-046-25I from the monitoring plan. I concur with this recommendation.
- (3) In Section 6.0, Solutions-IES recommends adding well CEF-046-27D to the monitoring program as a downgradient compliance well to CEF-046-06D. I cannot concur with this recommendation because monitoring well CEF-046-27D is not shown on any of the figures within the report, it is not shown that that well is screened at the same depth as CEF-046-06D, and groundwater flow direction within the deeper part of the surficial aquifer is not depicted in a figure. The data presented in the report does not support the recommendation.
- (4) On page 5, Section 3.3, fourth bullet, benzene should be replaced with sulfate.
- (5) Please make a note to mention changes in pH in the next report submitted. I am interested in whether pH will increase in some of the more acidic wells now that the air sparge system has been turned off.

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

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Greg Fraley, EPA Region 4
Mark Speranza, TtNUS, Pittsburgh
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