

N60200.AR.005435
NAS CECIL FIELD, FL
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON FOURTH QUARTER GROUNDWATER MONITORING REPORT FOR
DECEMBER 2009 FOR JET ENGINE TEST CELL NAS CECIL FIELD FL
7/13/2010
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 Report, December 2009, Jet Engine Test Cell (JETC), Former Naval Air Station Cecil Field, Jacksonville, Florida.

Dear Mr. Sanford:

I have completed my review of the Fourth Quarter, Groundwater Monitoring Report, December 2009, Jet Engine Test Cell (JETC), 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 and 5 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 JETC, 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) On Figure 4, contaminant concentration information is only provided for two monitoring wells, CEF-334-34S and CEF-811-18S. Groundwater was collected for analysis from five wells. In the future, please provide the results of the analyses of all wells that were sampled in the figure.
- (3) I do not currently have all the information necessary to formally agree with the recommendation made by Solutions-IES to reduce the number of monitoring wells to be sampled to only two as well as reducing the analyses to TRPH only. However, based on the information already formally submitted and the data provided in Table 3, I can agree that laboratory analyses for BTEX and MTBE can be eliminated.
- (4) For the purpose of formally submitting the fourth quarter 2009 groundwater monitoring results, the report is acceptable.

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
Rob Simcik, TtNUS, Pittsburgh
Mike Halil, CH2M Hill, Jacksonville
Mike Fitzsimmons, FDEP, Northeast District
John Flowe, City of Jacksonville
Jessica Keener, Solutions - IES, Raleigh, North Carolina

JJC  ESN