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NAS CECIL FIELD, FL
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MEMORANDUM REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION COMMENTS ON REMEDIAL ACTION PLAN FOR BUILDING 271 TANKS
UL/R/SUL/D DRAFT ACTING AS FINAL NAS CECIL FIELD FL
11/5/2002
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT

Memorandum

Florida Department of
Environmental Protection

TO: David Grabka, Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section

FROM:  Greg Brown, P.E., Professional Engineer
Gregory M. Brown, P.E.

Digitally signed by Gregory M. Brown, P.E.
DN: cn=Gregory M. Brown, P.E.,
o=Florida Department of Environmental
Protection, ou=Bureau of Waste
Cleanup/Technical Review Section, c=US
Date: 2002.11.05 11:32:38 -05'00'

Validity unknown
DATE:

November 5, 2002

SUBJECT: Remedial Action Plan for Building 271 Tanks
UL/R/SUL/D at Former Naval Air Station Cecil Field,
Jacksonville, Duval County, Florida

I reviewed the subject engineering document dated September 2002 (received September 30, 2002). Mr. Steven L. Brashers, P.E., Florida Professional Engineer No. 47151, is the engineer of record for this engineering document. The subject engineering document describes a thorough design for an air sparging (AS) system.

No soil vapor extraction (SVE) is specified in the design. Department policy requires SVE with AS. AS alone, however, has been approved on a limited case-by-case basis where SVE is not feasible because of physical constraints such as shallow groundwater or land use factors. Prior to Department approval of these limited projects, however, conservative air emissions screening is required to demonstrate that the 13.7 pound per day Hazardous Air Pollutant threshold is not expected to be exceeded and local receptors will not be exposed to hazardous vapor emissions including migration to confined spaces. These projects also require ambient air monitoring during operations to confirm the air emissions screening results.

It is not obvious in the RAP that shallow groundwater or land-use constraints make SVE infeasible. Additionally, the subject design document provides no proposed air emissions monitoring. The subject document therefore can not be approved at this time without additional clarifying information. I suggest the Navy review air emissions monitoring that had been proposed for OU 9, Site 36 and Site 37 as an example. Groundwater flow direction is reported towards the southeast, and there is no monitoring well up-gradient of former Tank 271-UL bounding the contaminated groundwater plume. The design engineers should therefore consider extending the area of treatment northwest of AS-01. If you have any questions, please call me at (850) 245-8993.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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