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NAS CECIL FIELD
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FINAL SITE
ASSESSMENT FOR SOUTH FUEL FARM NAS CECIL FIELD FL
5/10/2012
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

May 10, 2012

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

RE: Draft Final Site Assessment Report for South Fuel Farm, Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Sanford:

I have completed my review of the Draft Final Site Assessment Report for South Fuel Farm, Naval Air Station Cecil Field, dated December 2011 (received December 22, 2011), prepared and submitted by Tetra Tech NUS, Inc. The following needs to be corrected:

- (1) In Table 2-1, the table should just be titled Groundwater Elevation Measurements. There really is not much monitoring well construction data in the table. Also, the groundwater elevations calculated for all the wells in August 24, 2011 are wrong. The depth to water measurements were subtracted from the June 1, 2010 groundwater elevations rather than the top of casing elevations. This table needs to be corrected and Figure 2-3, the August 2011 Groundwater Flow Map, needs to be redone.
- (2) Figure 3-1, Groundwater Sample Results, needs to be redone with the August 2011 data included.
- (3) Section 4.0, Conclusions and Recommendations, should be redone. The Table 4-1 MONA Plan Milestone Objectives are incorrectly proposed. The initial concentrations identified in that table are average concentrations taken from multiple wells over three sampling events. What needs to be provided are a list of source wells and downgradient compliance wells. For the source wells, milestone objectives should be calculated with initial concentrations being from the last sampling data collected.

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- (4) The proposal to monitor for natural attenuation is acceptable to the Department. However, the monitoring plan needs to be structured based on the requirements of Section 62-770.690, Florida Administrative Code.

Please prepare the final Site Assessment Report with the corrections I have identified above. The final Site Assessment Report is required to be signed and sealed by a Professional Geologist or Professional Engineer in accordance with Section 62-770.490, Florida Administrative Code. 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: John Flowe, City of Jacksonville
Debbie Vaughn-Wright, EPA Region 4
Rob Simcik, TtNUS, Pittsburgh
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Mike Fitzsimmons, FDEP, Northeast District

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