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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION CONCURRENCE WITH
TECHNICAL MEMORANDUM OPTIMIZATION REPORT FOR AIR SPARGING/BIOSPARGING
SYSTEM AT NORTH FUEL FARM NAS CECIL FIELD FL

8/20/2008

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

August 20, 2008

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

RE: Technical Memorandum: Optimization Report for Air Sparging/Biosparging Treatment System, North Fuel Farm Site, Former Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Sanford:

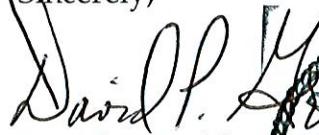
The Department has reviewed the Technical Memorandum: Optimization Report for Air Sparging/Biosparging Treatment System, North Fuel Farm Site, Former Naval Air Station Cecil Field, dated June 26, 2008 (received by e-mail on July 14, 2008), prepared and submitted by CH2M Hill Constructors, Inc. The Technical Memorandum recommends a reduction in the scope of the area to be treated in order to concentrate active remediation on four "hot spot" areas as determined by recent groundwater sampling. The Department concurs with the recommendations provided in the Technical Memorandum that are specified below:

- (1) Redefine target treatment areas for air sparging and biosparging based on the most recent groundwater sampling. Discontinue treatment of areas where benzene levels are below 100 µg/L.
- (2) Following reconfiguration of the treatment system, monitor groundwater outside the new treatment area to evaluate contaminant concentrations and determine the path forward for the treatment system.
- (3) Continue sampling the existing treatment monitoring well network of 16 monitoring wells for petroleum chemicals of concern and select natural attenuation parameters on a quarterly basis for 1 year beginning in May 2008, to monitor for rebound and system modification effectiveness.
- (4) One year following system optimization, evaluate the former treatment area for permanent disconnection from the AS/BS system. Modification to the groundwater monitoring network will also be evaluated at that time.

Mr. Art Sanford
August 20, 2008
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Please note that the Department's concurrence with the recommendations in the Technical Memorandum comes with one caveat. The Navy should not "abandon" any components of the current system to achieve optimization. If the Navy should want to abandon any part of the AS/BS system, they should formally request concurrence from the Department, at which time the Department may issue a more formal concurrence, such as a Remedial Action Plan Modification Approval Order, a Post-Active Remedial Monitoring Approval Order or a Monitored Natural Attenuation Approval Order. If you have any questions, please contact me at (850) 245-8997.

Sincerely,


David P. Grabka,
Remedial Project Manager



20 August
date

- CC: Doyle Brittain, EPA Region IV, Atlanta
Mark Speranza, TtNUS, Pittsburgh
Mark Peterson, TtNUS, Jacksonville
Mike Halil, CH2M Hill, Jacksonville
Mike Fitzsimmons, FDEP, Northeast District
John Flowe, City of Jacksonville

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