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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON TECHNICAL MEMORANDUM EVALUATION OF BIOSPARGING AND
BIOVENTING SYSTEMS AT SOUTH FUEL FARM NAS CECIL FIELD FL

7/3/2006

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

July 3, 2006

Commanding Officer
Mr. Mark Davidson, Code ES33
SOUTHNAVFACENGCOM
Post Office Box 190010
North Charleston, SC 29419-9010

RE: Technical Memorandum, Evaluation of Biosparging and Bioventing Systems at the South Fuel Farm Facility, Naval Air Station Cecil Field, Florida.

Dear Mr. Davidson:

The Department has completed its review of the Technical Memorandum, Evaluation of Biosparging and Bioventing Systems at the South Fuel Farm Facility, Naval Air Station Cecil Field, dated June 6, 2006 (received by e-mail on June 6, 2006), prepared and submitted by CH2M Hill Constructors, Inc. Jeff Lockwood, P.E., and I have the following comments on the Technical Memorandum:

- (1) The Department essentially agrees with Michael Singletary's comments. The Department agrees there is no need to monitor soil annually if soil samples collected per the Technical Memorandum are clean. Also, as the Finding of Suitability for Transfer for the JAA Phase V Parcels indicates that there will be a non-residential restriction on the South Fuel Farm Parcel, contaminant concentrations in soils would need to only meet commercial/industrial and leachability SCTLs.
- (2) Monitoring of groundwater should continue as groundwater from monitoring well 2N has TRPH above its GCTL.
- (3) As the only other groundwater exceedance was for lead in monitoring well 6N, the Department agrees that the bioventing, if required, can be limited to the green shaded area, operating the 8 new bioventing wells if need be to attain the required wellhead and radius of influence.
- (4) Figure 4 should be corrected in the legend (where ROI is referenced) to show the 8 blue wells as being biovent wells,

"More Protection, Less Process."

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not biosparge wells.

- (5) Biovent wells BV-06 and higher may be taken off line if needed, but until the new soil data has been collected and evaluated, it may be premature to do so with biovent well BV-05 as it is close to monitoring well 2N.

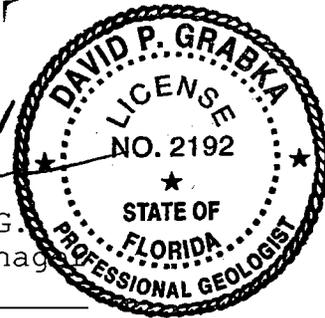
As the South Fuel Farm site is being remediated under the State's petroleum cleanup rule, a request to either place the site in either Post-Action Remediation Monitoring or to modify the remediation system must be put in an appropriate document signed and sealed by a Professional Engineer or Professional Geologist. If you have any concerns regarding this letter, please contact me at (850)245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager

3 July 2006
date



CC: Mike Halil, CH2M Hill
Doyle Brittain, USEPA, Atlanta
John Flowe, City of Jacksonville
Mark Speranza, TtNUS, Pittsburgh
Mike Fitzsimmons, FDEP, Northeast District

JJC



ESN

