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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REVIEW OF DRAFT SITE ASSESSMENT REPORT ADDENDUM FOR DAY TANK 1 NAS CECIL FIELD FL
8/27/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

August 27, 2003
OFFICIAL CORRESPONDENCE

Commanding Officer
attn: Mr. Gabe Magwood, Code ES24
Southern Division
Naval Facilities Engineering Command
Post Office Box 190010
North Charleston, SC 29419-9010

Dear Mr. Magwood:

I have completed my review of the Draft Site Assessment Report Addendum (SARA) for Day Tank 1, Naval Air Station Cecil Field, dated May 2003 (received May 21, 2003), prepared and submitted by Tetra Tech NUS, Inc. The SARA adequately delineates petroleum contaminated soil at the site. However, I cannot concur with the soil excavation boundaries as proposed in the SARA without confirmatory sampling to confirm that all contaminated soil with contaminant concentrations above the Department's leachability soil cleanup target levels (SCTLs) would be removed. The soil excavation boundaries proposed in the SARA are arbitrarily placed through points halfway between sampling locations where contaminated soil above SCTLs was detected and sampling points where soils were identified as being clean with concentrations below SCTLs. This would allow contaminated soil with the potential to cause groundwater contamination to remain after contaminated soil excavation.

In order to remediate all the contaminated soil at the site, either the soil excavation boundaries need to be extended to the clean line which would not require confirmatory sampling, the excavation can proceed as proposed in the SARA but with confirmatory sampling, or further sampling to define the soils to be excavated could be conducted and that soil excavated. Based upon figures showing the sampling locations where soil sampling and analysis has been conducted, it seems that Areas C and D show the most promise in terms of possibly reducing the footprint of the area of contaminated soil. I would also like to point out that calculations of volumes for excavation were based upon an assumption of the water table lying nine feet below land surface and that the excavations would extend one foot below the water table. Based on the information in Table 3-1, the water table lies at most nine feet below land surface. In most areas, the depth to the water table appears to be at least a foot less. This would considerably reduce the amount of contaminated soil that would require excavation and disposal.

This electronic message is being sent in lieu of regular mail. If you have any questions concerning this review, please contact me at (850)245-8997.

Sincerely,

David P. Grabka, P.G.
Remedial Project Manager
MS4535
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Direct: 850.245.8997
FAX: 850.245.8703
david.grabka@dep.state.fl.us