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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT TECHNICAL MEMORANDUM FOR NO FURTHER ACTION AT
POTENTIAL SOURCE OF CONTAMINATION 46 NAS CECIL FIELD FL

6/13/2001

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

June 13, 2001

Commanding Officer
Mr. Mark Davidson, Code 1879
SOUTHNAVFACENGCOM
Post Office Box 190010
North Charleston, SC 29419-9010

RE: Draft Technical Memorandum for No Further Action, Potential Source of Contamination 46 (PSC 46), Facilities 72 and 177, Naval Air Station Cecil Field, Florida.

Dear Mr. Davidson:

I have completed my review of the Draft Technical Memorandum for No Further Action, PSC 46, Facilities 72 and 177, Naval Air Station Cecil Field, dated May 2001 (received May 4, 2001), prepared and submitted by Tetra Tech NUS, Inc. Based on the information presented in the report, the Department cannot concur with No Further Action at this site. I have the following comments on the report that require addressing:

- (1) On Figure 3-1, the soil sample immediately south of Building 302 is labeled in the chem-box as CEF-36-SB-B001-1. I believe this sample location is actually CEF-36-SB-B01A. Also, this sample was apparently taken at a depth of 6 to 7 feet below land surface. The report does not make it clear whether this soil sample was collected in the vadose zone, capillary fringe or beneath the water table. As soil was excavated only to 2 feet below land surface, if sample CEF-36-SB-B01A is located in the vadose zone, the contaminants detected in that area would represent a potential continuing source of groundwater contamination.
- (2) Based on the team's decision to excavate all soil with benzo(a)pyrene concentrations greater than 770 µg/kg and TRPH concentrations greater than 340 mg/kg, from Figure 5-4 it would appear that the soil in the vicinity of sample CEF-P46-SS-112-02 should have been excavated. This area appears to have been inadvertently missed in both the Action Memorandum and Dig and Haul Work Plan. However, it appears that the sample label CEF-P46-SS-112-02 was used for both the Phase II and Phase III sampling events. According to Table 5-1, sample CEF-P46-SS-112-02 did not have exceedances of PAHs over industrial SCTLs or TRPH during Phase II, while

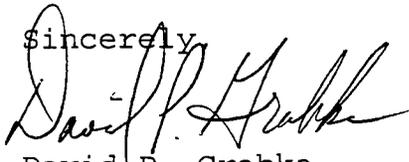
"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. Mark Davidson
Technical Memorandum
PSC 47
Page Two
June 13, 2001

a sample taken during Phase III with the same sample identification had exceedances for both contaminants. Table 6-2 also indicates that this area was not excavated. This needs resolution.

- (3) It would appear that the limits of soil contaminated with PAHs in Area No. 4 were not determined. It would appear from Figure 5-5 that the limits of the excavation were based on the fact that there were no exceedances in soil samples CEF-P46-SS-023, CEF-P46-022-01 and 85Q04401/85Q04402. However, based on the data in Table 5-1, soil samples SS-022-01 and SS-023 were not analyzed for PAHs. Also, the data from sample 85Q04401/85Q04402 could not be found within the report.
- (4) I cannot concur that No Further Action is warranted at this site as concentrations of PAHs still exist that would preclude residential development. A Land Use Control Implementation Plan (LUCIP) will be required to restrict the property to commercial/industrial use. The report does not indicate where the residential exceedances still exist and if there are areas that do not require land use controls. As the groundwater plume associated with Site 36 is located beneath the property, a groundwater use restriction will also be required.

If you have any concerns regarding this letter, please contact me at (850) 488-3693.

Sincerely,

David P. Grabka
Remedial Project Manager

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