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NAS CECIL FIELD, FL
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SOURCE REMOVAL REPORT FOR CONTAMINATED SOIL REMOVAL AT
JP-5 PIPELINE VALVE BOX 2 NAS CECIL FIELD FL
12/18/2001
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

December 18, 2001
OFFICIAL CORRESPONDENCE

Commanding Officer
attn: Mr. Nick Ugolini, Code ES242
Southern Division
Naval Facilities Engineering Command
Post Office Box 190010
North Charleston, SC 29419-9010

Dear Mr. Ugolini,

I have reviewed the Source Removal Report, Contaminated Soil Removal at JP-5 Pipeline Valve Box 2, Naval Air Station Cecil Field, dated November 2001 (received November 6, 2001). The report requests No Further Action for the site. I have the following comments that need to be addressed prior to No Further Action being approved for this site:

1. The Department reviewed a previous Source Removal Report (November 2000) for this site. The report received several comments that have not been resolved to date. The comments mainly addressed certain mistakes in figures and tables in the report. Please provide corrected figures and tables so that it can be verified that the original soil excavation removed all soils exceeding soil cleanup target levels from the southern side of the valve box. The Department also requested that a Site Assessment be conducted at the site in accordance with Chapter 62-770, Florida Administrative Code.
2. In Section 1.1 on page 1-1, it says that Figure 1-1 shows the limits of the original excavation and the location of the soil samples. Figure 1-1 is the Site Location Map. There is no figure showing the original excavation limits with the locations of soil samples taken during the original excavation.
3. Although the latest groundwater sample from well CEF-Pipe-1S did not contain contaminants that exceed groundwater cleanup target levels (GCTLs) except for methylene chloride, I do not feel confident that groundwater contamination can be ruled out at the site for the following reasons:
 - (a) Because methylene chloride and tetrachloroethene were detected in the trip blank and methylene chloride was detected in the laboratory blank, they are assumed to be laboratory contaminants. While methylene chloride is a common laboratory contaminant, the presence of PCE does not inspire confidence in the rest of the results.
 - (b) Concentrations of naphthalene, 1-methylnaphthalene, 2-methylnaphthalene and tetrachloroethene were detected in groundwater but at concentrations below GCTLs during the latest round of sampling. During the prior sampling event, naphthalene, 1-methylnaphthalene and 2-methylnaphthalene exceeded GCTLs.
 - (c) Lead was not analyzed for.
 - (d) A groundwater sampling log was not included with the report to verify that the well was properly purged prior to sample collection.
4. For the reasons stated above, I request that groundwater be resampled and analyzed for the complete gasoline and kerosene analytical group, including lead. Groundwater collected for the lead analysis should be collected using quiescent sampling technique to minimize turbidity.
5. Please submit a Site Assessment Report resolving the comments I have made on the Source Removal Reports. Based upon the information contained in that report, the Department will re-

evaluate the site to determine if further actions are necessary or the site can be considered remediated.

This electronic message is being sent in lieu of regular mail. If you have any questions concerning this review, please contact me at (850)921-9991.

Sincerely,

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