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NAS CECIL FIELD, FL
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LETTER REGARDING US EPA REGION IV COMMENTS ON DRAFT ANNUAL
GROUNDWATER MONITORING REPORT YEAR 1 FOR OPERABLE UNIT 10 (OU 10) SITE
25 NAS CECIL FIELD FL
1/8/2004
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

January 8, 2004

4WD/FFB

Commander
Department of the Navy
NAVFAC EFD SOUTH
Attn: Mark Davidson
Mail Code ES33
P.O.Box 190010
North Charleston, South Carolina 29419-9010

Subject: Draft Annual Groundwater Monitoring Report – Year 1 for Operable Unit
10, Site 25, Naval Air Station Cecil Field, Jacksonville, Florida
(FL5170022474)

Dear Mr. Davidson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject document.
Our comments follow:

1. Table 1-1 indicates that the hydraulic gradient (indicative of the direction of ground-water flow) is variable at OU 10, Site 25. While Figure 1-3 indicates that in February 2003 the direction of ground-water flow over most of the area shown is generally to the east, data from September 2000 indicate the direction of ground-water flow at that time was more or less to the west. Based on data presented in Section 3, the only wells that are being monitored for potential migration of potential contaminants of concern are to the east of the source area. There should either be monitoring of a well to the west of the source area to account for potential westward contaminant migration, or a more definitive evaluation of the direction of ground-water flow in the area needs to be made in the report. Figure 2-1 shows several shallow wells west of the source area. These wells are not included on Figure 1-3 or in Table 1-1. Possibly, water-level data from these additional wells could be cited as further definition of the overall eastward direction of ground-water flow, or a statement could be made at the close of Section 1 about the general direction of ground-water flow, based on the totality of data in Table 1-1.
2. Figure 2-1 shows that for the well where BHCs have been detected, there are two entries for the BHC analytical results for both sample periods (e.g. 0.12/0.12; alpha BHC for the 7/99 sample). The figure needs to indicate what the pair of

results mean.

If you have any questions, please contact me at 404/562-8539 or at vaughn-wright.debbie@epa.gov.

Sincerely,



Deborah A. Vaughn-Wright
Remedial Project Manager

Cc: Jeff Meyers, NAVFAC EFD SOUTH, code ES3
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Mike Halil, J.A. Jones