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NAS CECIL FIELD, FL
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TETRA TECH RESPONSES TO U S EPA REGION IV AND FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION COMMENTS ON DRAFT ANNUAL GROUNDWATER
MONITORING REPORT FOR OPERABLE UNIT 10 (OU 10) SITE 21 NAS CECIL FIELD FL

6/3/2004

TETRA TECH NUS INC

Response to Comments
Draft Annual Groundwater Monitoring Report – Year 1 for Operable Unit 10, Site 21
Naval Air Station Cecil Field
Jacksonville, Florida

EPA 1/8/04

1. **Comment:** For Table 1-1, the February 2003 ground-water elevation data are also presumably updated, based on the resurveying of the top of casing elevations. Rather than the table noting (per the double asterisk) that the resurveying occurred based on the February 2003 data, a single asterisk should be used to indicate that the February 2003 water levels also represent adjusted data. As presented in the table, one cannot be sure if the February 2003 data are corrected or not. The text on page 1-1 explains that the resurveying occurred, so the double asterisk footnote in the table is not needed.

Response: Table will be revised per the comment.

2. **Comment:** The report does not include a discussion of any residual soil contamination that might be present in the ground-water contaminant source area. Discussion in the third paragraph of Section 1 indicates that an interim removal action to address contaminated soil has occurred at Site 21. There should be some statement in Section 1 of the report, if possible, about any residual concentrations of chlordane that remain in the soil, as well as the concentrations of chlordane in soils that have been removed from Site 21. The concern here is that there may be remaining chlordane mass in the soil that would prolong the time required to meet groundwater cleanup target levels.

Response: The following sentence will be added after the first sentence in the third paragraph in Section 1.0:

Sample locations where contaminant concentrations exceeded leachability Soil Cleanup Target Levels (SCTLs) were also excavated (TtNUS, 2001a).

The following paragraph will be added after third paragraph in Section 1.0:

The site-wide post-excavation 95-percent upper confidence level (UCL) concentration of chlordane (alpha-chlordane and gamma-chlordane) in soil is 1,024 µg/kg, which is less than the leachability SCTL of 9,600 µg/kg. The maximum reported total concentration of alpha-chlordane and gamma-chlordane in the excavated soil was 108,200 µg/kg, but none of the locations where the chlordane concentration was greater than the leachability SCTL was near the plume (TtNUS, 2001a).

3. **Comment:** Figure 2-1 would be improved if it showed any RI data for chlordane detections (or nondetections) in wells CEF-P21-05S and CEF-P21-06S.

Response: The subject wells were not sampled during the RI because no contaminants were detected in the previous sampling event (August 1999). However, Figure 2-1 has been revised to show that the chlordane concentrations were less than detection limits.

FDEP 3/24/04

There were no comments other than the request to include the electronic copy of the laboratory data in Appendix A (as indicated on the Appendix A flysheet in the draft).