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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON OPERATIONS AND MAINTENANCE STATUS REPORT THIRD QUARTER
2006 FOR AIR SPARGING SYSTEM AT JET ENGINE TEST CELL NAS CECIL FIELD FL

3/26/2007

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 26, 2007

BRAC PMO SE

Attn: Mr. Mark Davidson

4130 Faber Place Drive

Suite 202

North Charleston, SC 29405

RE: Operations and Maintenance Status Report for the Air Sparging System, Jet Engine Test Cell, (Option Year 1, 3rd Quarter 2006-2007), Naval Air Station Cecil Field, Jacksonville, Florida.

Dear Mr. Davidson:

I have completed my review of the Operations and Maintenance Status Report for the Air Sparging System, Jet Engine Test Cell, (Option Year 1, 3rd Quarter 2006-2007), Naval Air Station Cecil Field, dated February 28, 2007 (received March 16, 2007), prepared by ESA Environmental Specialists, Inc. I have the following comments on the report:

- (1) The report is more accurately characterized as a groundwater monitoring report. The operational efficiency of the air sparging system was not contained in the report. There was no description on how the system was running and whether there were problems observed or unanticipated downtime. Also, there were no air sparging system pressure/flow rate monitoring data reported.
- (2) Groundwater sampling logs were not attached in the appendix to the report. Also, field parameter measurements were not included.
- (3) The groundwater cleanup target level (GCTL) and natural attenuation default concentration (NADC) for toluene are reported as being 1 µg/L and 10 µg/L, respectively in Table 2-1. The correct GCTL and NADC for toluene are 40 µg/L and 400 µg/L, respectively.
- (4) No water level measurements were provided. The Potentiometric Surface Map depicted in Figure 2-1 contours water levels measured in the previous quarter.

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Jet Engine Test Cell
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- (5) As I have commented on past reports for this site, it has been several years since a comprehensive test of water quality was done at this site. I propose sampling and analyzing groundwater from all the wells on site to verify that only groundwater in the vicinity of monitoring well CEF-811-18S has contamination above groundwater cleanup target levels.
- (6) As contamination slightly above groundwater cleanup target levels remains only in monitoring well CEF-811-18S (1.3 µg/L benzene) and at concentrations well below benzene's natural attenuation default source concentration (100 µg/L), the Department would be amenable to turning the air sparging system off in order to determine if contaminant concentrations would rebound once the system is off.

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If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager

CC: Doyle Brittain, USEPA, Atlanta
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