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LETTER REGARDING TETRA TECH RESPONSE TO FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION COMMENTS ON DIG AND HAUL PACKAGE FOR
BUILDING 290A TANK G290A NAS CECIL FIELD FL
11/13/2007
TETRA TECH NUS INC



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Project Number N4248

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Reference: CLEAN III Contract Number N62467-94-D-0888
Contract Task Order Number 0248

Subject: Response to Comments for Dig and Haul Package
Building 290A, Tank G290A
Naval Air Station Cecil Field
Jacksonville, Florida

Dear Mr. Grabka:

Tetra Tech NUS, Inc. (TtNUS) is pleased to submit this letter responding to your comments on the Dig and Haul Package for Building 290A, Tank G290A. The questions and/or comments that have been received by TtNUS are detailed below.

Comment #1: The proposed soil removal area as shown in Figure 1 has the excavation extending north past clean soil sample location CEF-B290A-SB-006 several feet into what looks like to be a paved area. I see no reason to extend the excavation past that soil sample.

RESPONSE: The proposed soil removal area will be revised accordingly. TtNUS agrees that the northern boundary should not extend more north of clean soil sample location CEF-B290A-SB-006. The new proposed soil removal area and a description of the confirmatory sampling event will be included in the Final Dig and Haul Package.

Comment #2: Also, the proposed excavation no longer extends to soil sample locations CEF-B290A-SB-003 and CEF-B290A-SB-004 as depicted in Tetra Tech's Supplemental Soil Assessment Letter Report for Tank G290-A (November 9, 2006). If this is the case, a confirmatory soil sample will be required on the southern face of the excavation to verify that petroleum contaminated soil does not remain.

RESPONSE: Based on this comment, confirmatory soil sampling was conducted in September 2007. TtNUS collected a soil sample (CEF-290A-SB-007) along the northern side of Tank G290-A's concrete secondary containment to delineate the southern boundary of the proposed soil removal area. Soil sample CEF-290A-SB-007 was collected at the 2-foot below ground surface (bgs) interval and analyzed for polycyclic aromatic hydrocarbons and for total recoverable petroleum hydrocarbons (TRPH). Naphthalene was detected with a concentration of 0.0021 milligram per kilogram (mg/kg), less than its residential Soil Cleanup Target Level of 55 mg/kg. All of other target analytes were not detected in soil



sample CEF-290A-SB-007. Based on this detection, the limits of excavation will be revised back to what appeared in the Supplemental Soil Assessment Letter Report.

Comment #3: Because soil analytical data appears confined to the top foot of soil, I cannot confirm the necessity of excavating to the water table. But since the excavation is being conducted to the water table, I will not require a soil sample to be collected from the floor of the excavation.

RESPONSE: Based on the confirmatory soil sampling conducted in September 2007 in which additional depth samples were collected at 2 feet bgs at CEF-290A-SB-007, at 2 feet bgs at CEF-290A-SB-005, and at 2 feet bgs at CEF-290A-SB-005, the excavation will be conducted to 2 feet bgs. A tag map figure summarizing all of the soil results from the site is included in Figure 1 in the Final Dig and Haul Report.

Comment #4: The report is correct in that in order to obtain site closure, a groundwater sample will need to be collected and shown not to be contaminated with petroleum constituents above the department's groundwater cleanup target levels.

RESPONSE: TtNUS will collect a groundwater sample after the Dig and Haul to confirm that naphthalene and TRPH have not leached into the groundwater.

If you have any questions with regard to this submittal, please do not hesitate to contact Kara Wimble at (904) 730-4669, extension 214, or via email at Kara.Wimble@TetraTech.com.

Sincerely,

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