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NAS CECIL FIELD, FL
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON SITE ASSESSMENT REPORT ADDENDUM FOR BUILDING 82 TANK G82
NAS CECIL FIELD FL
7/3/2001
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

July 3, 2001

Mr. Nick Ugolini
Code 1843 (UST RPM)
Southern Division
Naval Facilities Engineering Command
Post Office Box 190010
North Charleston, South Carolina 29419-9010

RE: Site Assessment Report Addendum for Building 82, Tank G82, Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Ugolini:

I have completed the technical review of the Site Assessment Report Addendum for Building 82, Tank G82, Naval Air Station Cecil Field, dated March 2001 (received April 3, 2001), prepared and submitted by Tetra Tech NUS, Inc. While the report adequately represents the environmental conditions of the property, the Department is not yet convinced that the proposed remedy of land use controls, engineering controls and monitoring only for natural attenuation is the most cost effective or quickest remedy that could be selected for the site.

Approximately 49 cubic yards of contaminated soil was left in place because it could not be excavated without compromising existing utilities or the Building 82 foundation. Some of this soil exists directly above the water table, exceeds leachability criteria and through SPLP testing has shown the potential to leach to groundwater at concentrations exceeding the Department's groundwater cleanup target levels. Fluctuating water table elevations may cause continued leaching of these contaminants to groundwater extending the time frame for monitored natural attenuation to remediate groundwater at this site. A remedial option that may be useful to address contaminated soil is soil vapor extraction. This option could also be coupled with air sparging of groundwater to accelerate cleanup of both media. Please evaluate these options in light of the mass of contamination remaining in the soil, the potential for water table fluctuations to leach further contaminants to groundwater, and whether monitoring only with institutional and engineering

controls would be expected to achieve the milestone objectives as stated in the SARA.

As an additional note, it appears that monitoring well CEF-G82-1S was destroyed during source removal activities. Was this well properly abandoned? Also, this well should be replaced. While contaminant concentrations in this well decreased during the last sampling event to below GCTLs, this well appears to be in the general area where contaminated soil was not removed. Also, if monitoring only for natural attenuation remains the only viable option at this site, please collect a complete set of groundwater samples for analysis so as to have post source removal action baseline groundwater data to develop milestone objectives.

If I can be of any further assistance with this matter, please contact me at (850) 488-3693.

Sincerely,

David P. Grabka
Remedial Project Manager

cc: Scott Glass, Southern Division
Debbie Vaughn-Wright, USEPA Region 4
Mark Speranza, TetraTech NUS, Pittsburgh
Sam Ross, CH2M Hill Constructors, Inc.
Mike Fitzsimmons, FDEP Northeast District

TJB _____ JJC _____ ESN _____