

N60200.AR.003045
NAS CECIL FIELD, FL
5090.3a

LETTER REGARDING TETRA TECH RESPONSE TO FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION COMMENTS ON SITE ASSESSMENT REPORT
ADDENDUM FOR BUILDING 82 TANK G82 NAS CECIL FIELD FL
8/21/2001
TETRA TECH NUS INC



TETRA TECH NUS, INC.

661 Andersen Drive ■ Pittsburgh, Pennsylvania 15220-2745
(412) 921-7090 ■ FAX (412) 921-4040 ■ www.tetrattech.com

PITT-08-1-025

August 21, 2001

Project Number 0394

Mr. David Grabka
Florida Department of Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, FL 32301

Reference: CLEAN Contract No. N62467-94-D-0888
Contract Task Order 0108

Subject: Response to Comments on Building 82, Tank G82 SARA
Naval Air Station Cecil Field
Jacksonville, Florida

Dear Mr. Grabka:

TtNUS received your letter of July 3, 2001 and reviewed the comments on the subject report. FDEP indicates that the institutional and engineering controls and monitoring proposed in the Site Assessment Report Addendum (SARA) may not be the most cost effective or quickest remedy that could be selected for the site. It was further requested that active remedial options be evaluated in light of the mass of contamination remaining in the soil, the potential for water table fluctuations to leach further contaminants, and whether monitoring only with institutional and engineering controls would be expected to achieve the milestone objectives stated in the SARA. However, this evaluation does not need to be put in the form of a Remedial Action Plan (RAP).

Based on G82 site conditions, an alternative approach to a formal evaluation of active remedial options is proposed. Specifically, we propose to collect an additional round of groundwater samples for natural attenuation parameters (such as VOCs, PAHs, TRPH, dissolved oxygen, pH, alkalinity, ferrous iron, ORP, nitrite/nitrate, sulfate, sulfides, and methane/ethane/ethene) and evaluate the natural attenuation potential for the site using a basic groundwater model such as BIOSCREEN. This alternative approach will provide a more reliable method of determining the effectiveness of the monitored natural attenuation. If the modeling shows that natural attenuation will not be effective in a reasonable time frame, then the active remedial methods will be considered.

There are several reasons why natural attenuation is likely to be more favorable for this site compared to active remedial methods.

First, much of the contaminated soil and groundwater are located beneath the 12-inch thick concrete flightline apron. The area is immediately in front of the active control tower building (Building 82). Any active remedial methods, such as air sparging and vapor extraction, must penetrate the concrete. Since the area needs to remain unobstructed, then additional concrete demolition and replacement would be required to place the piping below grade causing an additional expense beyond those of a typical unpaved site.

Second, the quantity of the contaminated soil and groundwater is relatively small. The amount of contaminated soil is estimated to be about 78 cubic yards. The length of the groundwater plume is less than 60 feet.

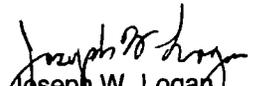
Finally, there is not a significant exposure route to the groundwater. The area down gradient of the plume includes the runways and taxiways where the probability of groundwater use and exposure is non-existent. Further, the plume must travel more than 7,000 feet before reaching surface water. The time for the groundwater to travel that distance would be significant.

Therefore, a closer examination of the natural attenuation approach is needed before evaluating active remedial options.

As a side note, the letter of July 3 also commented on the status of well CEF-82-1S. This well was in the excavation and was abandoned during the excavation. A replacement well was installed in December 2000.

If you have any questions, please contact me at 412-921-7231,

Sincerely,


Joseph W. Logan
Task Order Manager

JWL/kf

cc: Nick Ugolini, SOUTHDIV
Debbie Wroblewski, TtNUS
Mark Perry/File CTO 108