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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON OPERATIONS AND MAINTENANCE STATUS REPORTS FOR AIR SPARGING SYSTEM AT BUILDING 271 NAS CECIL FIELD FL
2/9/2007
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

February 9, 2007

BRAC PMO SE
Attn: Mr. Mark Davidson
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

RE: Operations and Maintenance Status Reports for the Air Sparging System, Building 271, Naval Air Station Cecil Field, Jacksonville, Florida.

Dear Mr. Davidson:

I have completed my review of several Operations and Maintenance Status Reports for the Air Sparging System, Building 271, Naval Air Station Cecil Field, prepared by ESA Environmental Specialists, Inc. The reports cover the First Quarter 2005 (dated November 22, 2005), the Third Contract Quarter 2006 (dated February 28, 2006), the Fourth Contract Quarter 2006 (dated May 16, 2006) and the Option Year 1, Second Quarter 2006-2007 (dated November 28, 2006). I have the following comments on the four reports:

(1) The operational efficiency of the air sparging system has been terrible of late. According to the last Operations and Maintenance Status Report received, the percent of operation since May 17, 2005 has been only 20.38%. In contrast with this, the percent of time the air sparging system was in operation was 78.4% for the period covering the first through the fourth quarter of 2004 according to the reports from CH2M Hill. The Navy needs to fix the system or propose some new alternative.

(2) I consider the dissolved oxygen and oxygen-reduction potential values as being possibly the most important in determining the potential for aerobic processes to degrade petroleum contamination in groundwater. The values that have been reported lately when the air sparging system has been running less than one third of the time have not indicated much improvement in aerobic conditions within the aquifer, especially in comparison with the values when the system was running most of the time. This further supports the need to either fix the system or propose a new alternative.

(3) 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-271-07S has contamination above groundwater cleanup target levels.

(4) 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. The correct GCTL and NADC for toluene are 40 µg/L and 400 µg/L, respectively.

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: Tim Bahr, FDEP
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Mark Speranza, TtNUS, Pittsburgh
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JJC for ESN