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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SITE ASSESSMENT REPORT FOR BUILDING 312 OIL-WATER
SEPARATOR 312-OW NAS CECIL FIELD FL

8/26/2002

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

August 26, 2002

Mr. Wayne Hansel
Code ES245 (UST RPM)
Southern Division
Naval Facilities Engineering Command
Post Office Box 190010
North Charleston, South Carolina 29419-9010

RE: Site Assessment Report for Building 312, Oil-Water Separator
312-OW, Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Hansel:

I have reviewed the Site Assessment Report for Building 312, Oil-Water Separator 312-OW, Naval Air Station Cecil Field, dated April 2002 (received April 10, 2002), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments that should be addressed in a Site Assessment Report Addendum:

- (1) I cannot resolve the detections by the mobile laboratory of benzene above its leachability soil cleanup target level (SCTL) in two soil samples located within the area excavated by CH2M Hill Constructors Inc. (CCI) in early 2000 without there having been a subsequent discharge from the Oil-Water Separator after the source removal. It is presumed that CCI backfilled the excavation with clean soil. It is also possible that the mobile laboratory analyses are incorrect.
- (2) The mobile laboratory analysis of soil sample CEF-312-SB-002 did not correlate at all with the fixed-based laboratory analysis. The mobile laboratory identified benzene, toluene and total xylenes in the soil sample at that location, while the fixed-based laboratory identified no priority pollutant volatile organic compounds as being detected, only TRPH and tentatively identified semi-volatile compounds.
- (3) Direct-push groundwater sampling results from the mobile laboratory at CEF-312-GW-007 identified benzene, total xylenes and naphthalene at concentration greatly exceeding groundwater cleanup target levels (GCTLs). However, groundwater samples collected from monitoring well CEF-312LS-3S identified only trace amounts of ethylbenzene,

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total xylenes and naphthalene at concentrations below their respective GCTLs. According to various figures in the SAR, the direct push sample is at the same location as monitoring well CEF-312LS-3S. The differences between the two samples and analyses needs to be reconciled.

- (4) Please note that for the tentatively identified compound 1,2,4-trimethylbenzene, the Department has a GCTL of 10 µg/L per Chapter 62-777, Florida Administrative Code. It is shown as not having a GCTL on Table 3-5.
- (5) In drainage ditch sediment sample CEF-312-SD-C001, polynuclear aromatic hydrocarbons and TRPH were detected at elevated concentrations, some being greater than residential, industrial, leachability to groundwater and leachability to freshwater surface water SCTLs. These contaminants are at concentrations that would require remediation. Contaminated sediment in the ditch has not been delineated and possible impacts to groundwater and surface water in that area have not been adequately addressed. The detection limits reported for PAHs in sediment sample CEF-312-SD-C002 were higher than residential, industrial and leachability SCTLs for some constituents.
- (6) I would propose the following supplemental site assessment activities:
 - (a) Resample soils in the area previously excavated by CCI and analyze the samples at a fixed-based laboratory to determine whether the benzene exceedances detected previously by the mobile laboratory are indeed present or whether the excavation by CCI adequately addressed this area.
 - (b) Conduct further sampling and analysis in the ditch to the north of the site to delineate the boundaries of sediment contamination. If water is in the ditch at the time of sampling, a surface water sample should be collected.
 - (c) Install a permanent monitoring well in the immediate vicinity of DPT location CEF-312-GW-002. This location is hydraulically downgradient of the area previously excavated by CCI and in an area where some soil contamination has been detected in soil samples.

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- (d) Delineation of soil contamination outside of the previously excavated area to determine the extent of soil contamination.
- (e) A complete set of water level measurements.
- (f) Groundwater sampling and analysis of all monitoring wells for the used oil parameters, excluding lead.
- (g) It is not clear from the report whether the oil-water separator and its associated tank still exist or whether they were removed at the time of CCI's source removal activities. If these structures still exist, contaminated soil may have been left so as not to compromise the system.

Please respond to the above comments and recommendations for further assessment in a Site Assessment Report Addendum. If I can be of any further assistance with this matter, please contact me at (850) 921-9991.

Sincerely,



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

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

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