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NAS CECIL FIELD
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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT TREATABILITY STUDY WORK PLAN FOR OPERABLE UNIT 2 (OU2) NAS CECIL FIELD FL

11/10/1993

U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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CERTIFIED MAIL
RETURN RECEIPT REQUEST

Mr. David Criswell
Remedial Activities Branch
Department of the Navy - Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr., P.O. Box 10068
Charleston, South Carolina 29411-0068

Re: Draft Treatability Study Work Plan for Operable Unit 2 at Naval Air Station Cecil Field, Jacksonville, Florida

Dear Mr. Criswell:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the Treatability Study Work Plan for Operable Unit 2, at Naval Air Station Cecil Field, Jacksonville, Florida and EPA's comment's are enclosed. These comments are divided into general and specific comments.

If you have any questions or concerns about the referenced comments or concerns about other matters, please contact me at the above address or call me at (404) 347-7603.

Sincerely,

James W. Hudson
Remedial Project Manager
Federal Facilities Branch

cc: Eric Nuzie, FDEP
David Criswell, SOUTHDIVNAVFACENGCOM

Post-It™ brand fax transmittal memo 7671	# of pages ▸ 3
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TECHNICAL REVIEW COMMENTS
DRAFT TREATABILITY STUDY WORK PLAN, FOR OPERABLE UNIT 2
NAVAL AIR STATION CECIL FIELD
JACKSONVILLE, DUVAL COUNTY, FLORIDA

GENERAL COMMENTS

1. Soil vapor extraction (SVE) is one of the three technologies listed in the Draft Work Plan for soil remediation. The depth to the water table is relatively shallow, ranging from 3 feet to 10 feet. Taking into account the various components of the well design and the fact that the well must be installed at least 1 to 2 feet above the water table, the SVE option does not appear to be practical. While the Draft Work Plan acknowledges that a depth to the water table of 3 feet may be too shallow, the fact is that SVE is generally not considered feasible at depths less than 10 feet.

2. In some instances in the Draft Work Plan, more detail should be given regarding the experimental procedures described in Section 4.0. The particular instances are provided in the Specific Comments section below.

3. Section 13.0, which deals with the project schedule, was extremely general. A more detailed schedule, such as shown on page 36 of the Guide for Conducting Treatability Studies Under CERCLA should be included in the Draft Work Plan.

SPECIFIC COMMENTS

1. Page 1-6, Table 1-1 and Table 1-2 - Provide the source for the maximum concentration values listed in these tables.

2. Page 4-2, Paragraph 3 - The text refers to a well that contains free product. Provide a description as to how the presence of free product will be addressed.

3. Page 4-9, Paragraph 1 - The text states that "a positive control sample will also be prepared containing common garden compost and glucose to measure carbon dioxide production in a system without toxicity." The text should explain what correlation a sample containing common garden compost has to samples collected from the site.

4. Page 4-12, Paragraph 1 - Provide additional information about the landfarming simulation such as the type of jar to be used, whether it will be sealed or open, how the soil moisture will be maintained and how the soil will be mixed.

5. Page 5-1, General - This section only lists lab equipment. Other equipment used in the performance of the treatability study should be mentioned such as the type and size of pumps,

motors and various other apparatus to be used. Also, a diagram of the various test apparatus should be included for each technology evaluation.

6. Page 6-1, Paragraph 2 - Explain what measures will be taken to minimize volatilization during compositing of the vadose zone samples.