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NAS CECIL FIELD, FL
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MEMORANDUM REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON DRAFT GROUNDWATER REMEDIAL DESIGN FOR OPERABLE UNIT 8 (OU 8) SITE 3 NAS CECIL FIELD FL
8/11/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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To MARK SPERANZA	From M.J. DELIZ	
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Memorandum

NAS Cecil Field Administrative Record Document Index Number

32215-008
06.08.08.0001

TO: Mike Deliz, P.G., Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section

FROM: Greg Brown, P.E., Professional Engineer II, Technical Review Section

DATE: August 11, 1998

SUBJECT: Draft Groundwater Remedial Design, OU 8, Site 3, NAS Cecil Field, Jacksonville, FL.

I reviewed the subject document dated June 1998 (received June 29, 1998). I have the following minor comments:

1. State of Florida rules for remedial actions at petroleum sites require biosparging or in-situ air sparging systems to be designed and operated in conjunction with air emission treatment systems. The flow rates for Site 3's in-situ air sparging system is relatively low (5 cfm or less per sparge point), and the consultant estimates a mass removal rate of 0.1 pounds per day of volatile organic compounds. The Navy is also specifying site monitoring during startup to obtain actual emission measurements. Given these mitigating factors, an emission treatment system is not warranted unless indicated otherwise. I request, however, that the Navy conduct a simple screening analysis to estimate ambient reference concentrations to verify that air emissions will not pose threats to public welfare. I am attaching guidance for conducting alternative air emissions evaluations from a Division memorandum dated May 17, 1996, titled, "Revised Guidance on Air Emissions from Petroleum Cleanup Sites."

2. The occupational safety of the Navy's remediation personnel and contractors is beyond the responsibility of the Department. As a best practice, however, it will be prudent for the Navy to restrict general access to the site during remedial system operations via fencing and posting. Personnel responsible for remedial operations and maintenance should conform to applicable hazardous waste health and safety practices when on-site.

3. Many remedial systems at Air Force and Navy installations in Florida have suffered premature failures from lightening damage. I recommend that this system be installed with reasonable precautions to minimize this threat.

Please call me if you have questions. Thank you.