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NAS CECIL FIELD, FL
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FACSIMILE TRANSMITTAL OF FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION COMMENTS ON DRAFT INTERIM WORK PLAN FOR SOIL AND FREE
PRODUCT REMOVAL ACTIVITIES AT NORTH FUEL FARM NAS CECIL FIELD FL
6/6/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Building
2800 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL LETTER

DATE: 6/6/95

TO: Gerald Pearson

AGENCY: Smith Div.

TELEPHONE: _____

NUMBER OF PAGES (INCLUDING COVER SHEET) 3

FROM: M. J. Deley

AGENCY: FDEP

If any of the pages are not clearly received, please call IMMEDIATELY,

Phone No. 904-921-9991

SENDERS NAME: _____

COMMENTS:

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**Florida Department of
Environmental Protection**

Memorandum

TO: Mike Deliz, P.G., Remedial Project Manager,
Technical Review Section

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

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

DATE: June 2, 1995

SUBJECT: Draft Interim Remedial Workplan, Soil and Free
Product Removal Activities for North Fuel Farm, NAS
Cecil Field, Jacksonville, Florida.

I reviewed the subject document dated May 1995 (received May 24, 1995) prepared by Bechtel Environmental, Inc., for the North Fuel Farm project. Mr. Frank B. Cater, P.E., Florida PE Number 42508. Bechtel Environmental, Inc., appears to be acting as a Delegated Engineer on this project. The Navy is still distributing engineering responsibilities between the CLEAN and RAC contractors as described in the Department's letter to the Navy dated January 5, 1995. An important difference since January is that all parties are beginning to routinely sign and seal their final engineering documents and accept responsible charge for their decisions without prompting from the Department. The quality of the Navy's engineer documents have improved as a result and I hope my minor comments below will demonstrate to that phenomenon. The IR Workplan is adequate for its intent with the following minor exceptions:

1. Section 1.3.2 mentions that a final RAP is being prepared. A CAR must be approved prior to RAP preparation. The CA is not complete but is presently in-progress.
2. A vertical isolation barrier is proposed without the gravel trench previously specified. Please explain the change in plan. What will be the impacts of the vertical isolation barrier on the subsurface hydrology of the site and the slope stability of the tank farm structure?
3. The Navy should minimize contaminated storm water by implementing best management practices. BMPs include, but are not limited to, containment by grading, berming, and covering. These methods can prevent storm water from contacting contaminated media or migrating off-site. Nylon scrim may not be sufficient to prevent contact between storm water and contaminated soil.

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MEMORANDUM

Mike Deliz, P.G.

June 2, 1995

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4. Off-gas treatment should be implemented in accordance with the Department's guidance ESS-3, Vacuum Extraction, Pilot Studies, Air Emissions, and Monitoring Requirements, September 10, 1993.
5. The Navy may consider sampling the oil/water separator effluent and analyzing for a less extensive analyte list once the waste stream is believed to be adequately characterized. This analyte list would depend on the FOTW's requirements for waste characterization.
6. The statistically based sampling plan using Michigan's guidance appears adequate for this specific project. The Navy should state in the sampling plan, however, the null hypothesis and its alternative for the specific sampling objectives.

Please call me if you have any questions.