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NAS CECIL FIELD, FL  
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"LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON THIRD QUARTER 2008, 2008 ANNUAL AND FIRST QUARTER 2009 LONG  
TERM MONITORING REPORTS FOR NORTH FUEL FARM NAS CECIL FIELD FL"

10/21/2009

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

October 21, 2009

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

RE: Third Quarter 2008, 2008 Annual, and First Quarter 2009 Long-Term Monitoring Reports, North Fuel Farm, Former Naval Air Station Cecil Field, Jacksonville.

Dear Mr. Sanford:

I have completed my review of the Third Quarter 2008, 2008 Annual, and First Quarter 2009 Long-Term Monitoring Reports, North Fuel Farm, Former Naval Air Station Cecil Field, dated December 31, 2008, April 15, 2009, and July 31, 2009, respectively (received January 6, 2009, April 17, 2009, and August 6, 2009, respectively), prepared and submitted by Solutions - IES, Inc. For comparative purposes, I have also reviewed the Operations and Monitoring Status Reports, Air Sparge, Biosparge and SVE System, North Fuel Farm Area Remediation Project, (July 2005-September 2006) and (October 2006-May 2007), Naval Air Station Cecil Field, dated February 2007 and November 2007, respectively (received April 11, 2007 and November 8, 2007, respectively), prepared and submitted by CH2M Hill Constructors, Inc. The CH2M Hill reports cover the period of time when the remediation system proposed in the Remedial Action Plan Addendum (TetraTech, January 2004) was operating. The Third Quarter 2008 Solutions report represents the period of time when modifications as proposed in the Optimization Report (CH2M Hill, June 26, 2008) were being implemented but the remediation system had not been restarted; the 2008 Annual and First Quarter 2009 Reports cover a period of time when the system had been restarted in accordance with the Optimization Report. I have the following comments on the Solutions reports:

- (1) Both the 2008 Annual Report and the First Quarter 2009 Report state in the last paragraph of Section 1.2 that the air sparge system was reconfigured and restarted in November 2008. However, neither report has an operations and maintenance status part describing how the system was running, operational efficiencies, problems encountered, pressure/flow rate monitoring measurements, etc. Please also note that the restarting of the system in November 2008 is refuted in Section 3.1 of the 2008 Annual Report but reaffirmed in the last paragraph on page 9.

- (2) In the Annual 2008 Report, in the last paragraph of Section 4.2 on page 7, the units for sulfate concentrations detected in particular wells is in  $\mu\text{g}/\text{L}$  where it should be in  $\text{mg}/\text{L}$ . The same error is made in the First Quarter 2009 Report on page 6, second to last paragraph.
- (3) The conclusion of the First Quarter 2009 Report in Section 4.0 is that based on analytical results from the March 2009 sampling event, contaminant concentrations are similar to those reported for previous sampling events conducted at the site. This conclusion indicates that the reconfiguring of the system in November 2008 has not yet had an appreciable effect on contaminant concentrations in the "hot" wells. Without operational data from the air sparge system, I cannot determine how the system is running and whether there should have been identifiable reductions detected already.
- (4) The recommendations of the First Quarter 2009 Report are to continue quarterly groundwater sampling of the 15 wells remaining in the monitoring well network and replacing destroyed well CEF-076-104D with CEF-076-117D until construction activities in the vicinity of the site are completed and a new well at the same location and screened depth of CEF-076-104D can be installed. It is also recommended that water levels be collected from additional wells to better determine groundwater flow directions at the different depths within the surficial aquifer. These recommendations are sound and should be implemented.

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: Mark Speranza, TtNUS, Pittsburgh  
Mike Halil, CH2M Hill, Jacksonville  
Mike Fitzsimmons, FDEP, Northeast District  
John Flowe, City of Jacksonville  
Jessica Dehart, Solutions - IES, Raleigh, North Carolina

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