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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON AVIATION GAS-E PROJECT COMPLETION REPORT NAS WHITING FIELD
FL
6/19/2009
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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June 19, 2009

Mr. Benjamin T. "Tread" Kissam, P.G.
Department of the Navy
Naval Facilities Engineering Command Southeast
Naval Air Station Jacksonville
Building 903
Post Office Box 30
Jacksonville, Florida 32212-0030

RE: Draft Project Completion Report, AVGAS Pipeline Section E (UST – 2), Naval Air Station Whiting Field, USEPA ID #FL2 170 023 244, Milton, Florida (WRS Infrastructure & Environmental, Inc., May 2009)

Dear Mr. Kissam:

I have reviewed the subject document dated May 2009 (received June 3, 2009). WRS was tasked with the cleanup of contaminated soils associated with the AVGAS (aviation gasoline) Pipeline Section E. This document addresses site preparation, dewatering, overburden removal, contaminated soil excavation, AVGAS pipeline removal, soil sampling and analysis, contaminated soil disposal, free product removal and disposal, excavation backfilling, and site restoration. Post-remediation monitoring activities including monitor well installation, groundwater sampling and analysis, analytical methods, and quality control procedures are also addressed. This completion report is adequate for its intent and purpose. However, I would like to capture several important conclusions in this response letter that were made in this report and make several recommendations. The important conclusions are:

1. Each AVGAS pipeline was uncovered, tapped, and drained. The lines were cut and capped, and approximately 4,000 gallons of water and 140 gallons of AVGAS were recovered from the lines.
2. A total of 9,998 tons (approximately 6,400 yd³) of excessively contaminated soil were excavated and transported for disposal at Macland Disposal Center.
3. Confirmatory soil samples were collected from nine locations around the perimeter of the excavation from ten to twenty feet bls. Three of these samples contained contaminants of concern in excess of the FDEP SCTL leachability value based on groundwater criteria for benzene. Three confirmatory samples were collected from the bottom of the excavation. One of the samples contained contaminants of concern in excess of the FDEP SCTL leachability value based on groundwater criteria for benzene.
4. Soil containing contaminants above the FDEP SCTL leachability value based on groundwater criteria remain at the site on the southwestern portion of the excavation and in the northeast floor to the excavation. Prior to backfilling, these areas with residual soil contamination were covered with Visqueen to separate the contaminated soil from clean

soil and to make it easier to identify the contaminated soil during future excavation. The Visqueen should also reduce groundwater percolation.

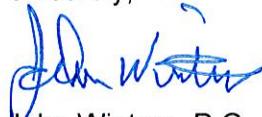
5. The general groundwater flow direction in the surficial aquifer at the site is to the north. The previous site data indicated that groundwater flow is to the south-southwest (TtNUS, 2003).
6. In the three groundwater samples collected in March 2009, no analytes were detected above the FDEP GCTLs.
7. During quarterly groundwater monitoring in March 2009, the three wells sampled stabilized with a turbidity reading greater than 20 NTUs. The turbidity was caused by suspended sediment in the groundwater, but it is not suspected to have affected the results of the laboratory analyses of these samples. The higher turbidities may have been caused by having the sampling tubing too close to the bottom of the well, since lower turbidities were observed during well development.

The following comments and recommendations are made by FDEP due to the conclusions presented in the report, which includes what has already been mentioned above:

1. Groundwater monitoring (quarterly?) should continue for at least three more sampling events with the last two events having no contaminants above their GCTLs. Please see 62-770.750 for more information.
2. Please see the Bureau of Petroleum Storage Systems' groundwater sampling SOPs concerning where to place the tubing in the monitoring well when purging and sampling.
3. Please use a more regional approach to calculating the groundwater flow direction at and around this site since groundwater flow data is limited at the site due to the number of monitor wells located there.
4. In the future, what will the Navy's recommendation be concerning the contaminated soil that was left in the excavation due to lack of funding?

Thank you for the opportunity to review this document. If you require additional clarification or other assistance please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.
Remedial Project Manager

JJC  ESN 