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NAS CECIL FIELD  
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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION RESPONSE TO U S NAVY  
COMMENTS TO REMEDIAL ACTION PLAN DAY TANK 1 FACILITY 293 NAS CECIL FIELD  
FL  
1/26/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Department of Environmental Protection

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Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

January 26, 1995

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Commanding Officer  
Mr. Bryan Kizer, Code 1842  
SOUTHNAVFACENGCOM  
Post Office Box 190010  
North Charleston, SC 29419-0068

RE: Remedial Action Plan Response to Comments, Day Tank 1, and  
Remedial Action Plan, Day Tank 1, Facility 293,  
Naval Air Station Cecil Field.

Dear Mr. Kizer:

Mr. Tim Larson of the Engineering Support Section has reviewed the response to comments for the Remedial Action Plan (RAP) for Day Tank 1, dated October 10, 1994 (received October 18, 1994) submitted for the above-referenced facility. Mr. Larson's response on the Navy's response to his original comments are enclosed. These responses do not satisfy his concerns and the RAP for this site can not be approved. Based on Mr. Larson's comments it appears that the proposed design is not appropriate for the remediation of this site and that other alternatives should be fully evaluated. In addition, I have reviewed the RAP for this site and these comments will also need to be addressed before this RAP will be approved.

1. Page 1-1, last sentence, why has the Navy decided to ignore the request for additional soil borings to delineate soil contamination at this site? My CAR approval letter dated February 14, 1994 specifically states "additional soil assessment is required", and 5 additional boring locations were requested. I further stated, that these could be done during the remedial action so the RAP could be submitted in a "timely manner". These borings are still required, I am particularly interested in determining if there is excessively contaminated soil on the north side of the containment area.
2. The groundwater plume at the site was never fully delineated. It was stated by ABB-ES's Jim Williams and Lisa Routhier, in a meeting on July 6, 1993 with myself and Jorge Caspary, that additional wells could not be installed in the flight line apron where aircraft are parked. Based on this

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Mr. Bryan Kizer  
January 26, 1994  
Page Two

assumption, it was decided by FDEP to accept the proposed locations for monitoring wells CEF-16 and CEF-19, even though they probably would not help in delineating groundwater contamination. Monitoring wells CEF-293-16 and CEF-293-18 are located so far downgradient that they are of little value to this investigation. CEF-293-18 is located 813 feet southeast of CEF-293-13 and 875 feet southeast of CEF-293-11. Likewise, CEF-293-16 is located 1025 feet southeast of CEF-293-11 and 938 feet southeast of CEF-293-13. In March and April of 1994, ABB-ES drilled through this same flight line apron numerous times during the CERCLA screening and confirmatory program at Site 16, approximately 500 feet to the north. When I found out that monitoring well installation could take place upon the flight line apron, I thought 5 additional monitoring wells would be needed to delineate the shallow groundwater plume (these locations are noted below). I was assured by you that the remedial design would be over-designed and would capture all of the groundwater plume even though we had only determined that the plume extended past CEF-293-11 and CEF 293-13 and ended before it reached CEF-293-16 and CEF-293-18. The Navy and the BRAC Cleanup Team must decide if it is cost effective to over-construct, and install an over-designed remedial system, or if they want to fully delineate the groundwater plume and design a properly-sized system to remediate the plume.

Five additional water table wells would further delineate the existing groundwater plume at Day Tank 1. These locations are as follows:

- a. Approximately 140 feet east of CEF-293-11.
  - b. Approximately 90 feet east and 75 feet south of CEF-293-11.
  - c. Approximately 90 feet east of CEF-293-13, adjacent to CEF-293-17D.
  - d. Approximately 95 feet south and 40 feet east of CEF-293-17D.
  - e. Approximately 162 feet east and 25 feet south of CEF-293-17D.
3. Page 3-3, Figure 3-1, the data gaps identified within the soil investigation identified within CAR are still considered data gaps (see Comment 1).

4. Page 3-5, Figure 3-5, values for benzene concentrations should be included on this map. In addition, what was the basis for 20,000 ppb, 10,000 ppb and the 1,000 ppb isoconcentration contours?
5. Page 3-4, Figure 3-6, values for total volatile organic aromatic concentrations should be included on this map. In addition, what was the basis for 50,000 ppb, 10,000 ppb and the 10,000 ppb, and 1,000 isoconcentration contours?
6. Page 3-7, Figure 3-7, values for naphthalene concentrations should be included on this map. In addition, what was the basis for 50,000 ppb, 10,000 ppb, 5,000 ppb and the 1,000 ppb, and 1,000 ppb isoconcentration contours?
7. Page 3-8, Section 3.4, what physical parameters were measured to determine "low permeability in soil"?
8. Page 3-12, Section 3.6.5, I question the stated "low hydraulic conductivity". It is later stated that the measured hydraulic conductivity at the site was questionable, but it measured .85 feet per day (ft/day). This number does not correspond to any site at N.A.S. Cecil Field. Measurements to date, have indicated that the hydraulic conductivity is 2 to 4 times greater than .85 ft/day. In fact, at Site 16, which lies approximately 500 feet to the north, the measured hydraulic conductivity in the shallow surficial aquifer is approximately 4 ft/day.
9. Pages 4-2 and 4-9, Figures 4-1 and 4-7, why was the scale changed from 1"=120' as in previous to 1"=100'?
10. Page 4-37, Section 4.8, what good is monitoring well CEF-293-18 in a monitoring program when it is over 800 feet from the site?
11. Appendix B-1, the calculation of free product does not take into consideration the 8 inches of free product that existed in CEF-293-7 before it was destroyed.
12. Appendix B-1, calculations determine that at least 911 gallons of free product will not be recovered. It is unclear how soil vapor extraction will remediate free product.
13. Appendix B-2, see Comment 8.
14. It appears additional remedial alternatives were excluded because of time to remediate and the supposed low hydraulic

Mr. Bryan Kizer  
January 26, 1994  
Page Four

conductivity. It has never been the BRAC Cleanup Team's goal to have all of the contaminated sites at Cecil Field completely remediated prior to base closure. Our goal is to have all of the sites adequately assessed and if necessary, to have initiated remedial actions by the time the Cecil Field closes. We are well aware that some sites may not be cleaned up for to 20 years.

If you have any concerns regarding this letter, please contact me at (904) 921-9991.

Sincerely,



Michael J. Deliz, P.G.  
Remedial Project Manager

cc: Tim R. Larson, FDEP Engineering Support Section  
Greg M. Brown, FDEP  
John Mitchell, FDEP Natural Resource Trustee  
Brian Cheary, FDEP Northeast District  
Jerry Young, City of Jacksonville  
Steve Wilson, SOUTHDIV  
~~Herb [redacted] SOUTHDIV~~

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