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NAS CECIL FIELD  
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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON DRAFT  
SAMPLING AND ANALYSIS PLAN AUGUST 2010 FOR JET ENGINE TEST CELL, NORTH  
FUEL FARM, DAY TANK 1 AND BUILDINGS 46 AND 271 NAS CECIL FIELD FL

01/06/2011

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Mimi A. Drew  
Secretary

January 6, 2011

BRAC PMOSE

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

RE: Draft Sampling and Analysis Plan, August 2010, Petroleum Sites: Jet Engine Test Cell; North Fuel Farm; Day Tank 1; Building 46; and Building 271, Naval Air Station Cecil Field, Jacksonville, Florida.

Dear Mr. Sanford:

I have completed my review of the Draft Sampling and Analysis Plan, Petroleum Sites: Jet Engine Test Cell; North Fuel Farm; Day Tank 1; Building 46; and Building 271, Naval Air Station Cecil Field, dated August 2010 (received August 26, 2010), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Draft Sampling and Analysis Plan:

- (1) On page 24, in the section on **Action Items**, n-propylbenzene is misspelled..
- (2) On page 24, in the section on **Consensus Decisions**, it mentions a decision regarding the sampling plan for the South Fuel Farm. The South Fuel Farm petroleum site is not a part of this Sampling and Analysis Plan.
- (3) In Section 10A.4, page 26, first paragraph, first sentence, this sentence does not belong with the LTM Summary for the Jet Engine Test Cell. It discusses the operation of two biological treatment systems and the injection of "oxygen" at the site. I am only aware of an air sparging system having been operated at the site.
- (4) In Section 10B.5.1 on page 30, please change G-11 to either G-II or G-2.
- (5) In Section 10B.5.2, page 30, second paragraph, third sentence, it says that the direction of groundwater flow may be changing based on recent groundwater measurements. Please elaborate on this further. I need to know how groundwater flow directions may be changing in order to know which wells may

be used as downgradient points of compliance wells and verify that they are part of the sampling and analysis plan.

- (6) In Section 10C.4, page 33, first paragraph, last sentence, please put a comma between the words "sulfate" and "oxygen reduction potential".
- (7) In Section 10E.5.1, page 40, last sentence, please put the word "recently" between the words "not" and "been detected".
- (8) In Section 11.1.A, page 41, first word, TRPH is misspelled.
- (9) In Section 11.4.A, **Decision Rule #3**, page 47, please add that if the groundwater sample from any compliance well has concentrations of COC contamination greater than its GCTL, that first the exceedance will be verified by an additional groundwater sample being collected and analyzed from the compliance well. If this verification sample also has COC contaminant concentrations above GCTL(s), then the installation of new monitoring well(s) will be conducted as part of the additional delineation of groundwater contamination.
- (10) In Section 11.4.B, page 47, **Decision Rule #5**, it twice mentions "action levels". Are these the "Project Action Levels" specified in SAP Worksheet #15, GCTLs, natural attenuation default concentrations, or some other remedial action levels?
- (11) On page 54, second paragraph, first sentence, please change the word "number" to "numbered".
- (12) In SAP Worksheet #15B, page 60, and SAP Worksheet #15C, page 65, please change the PAL for toluene to 40 µg/L.
- (13) In SAP Worksheet #15D, page 68, please identify the PAL for sulfate to be its GCTL, 250 mg/L.

If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.  
Remedial Project Manager  
Federal Programs Section  
Bureau of Waste Cleanup

Mr. Art Sanford

UFP-SAP for Five Petroleum Sites

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CC: Tim Bahr, FDEP

Rob Simcik, TtNUS, Pittsburgh

Mike Halil, CH2M Hill, Jacksonville

Mike Fitzsimmons, FDEP, Northeast District

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