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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW OF SOIL MONITORING WORK PLAN FOR SITE 413 NS MAYPORT FL
1/7/2011
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 7, 2011

Department of the Navy
Naval Facilities Engineering Command Southeast
Attn: Ms. Beverly Washington, IPT South Atlantic, OPA5
135 Ajax Street North, Building 135
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

**RE: Soil Monitoring Work Plan, Site 413, Naval Station Mayport, USEPA ID #FL9 170
024 260, Mayport, Florida (Tetra Tech NUS, Inc., December 3, 2010)**

Dear Ms. Washington:

I have reviewed the subject document dated December 3, 2010 which was received on December 6, 2010, and was completed under Contract Task Order JM33. The focus of this Work Plan involves the collection of soil samples. Soil samples will be collected at the site just above the soil and water interface and their analytical results will be used as a basis to prepare a Site Rehabilitation Completion Report (SRCR). The analytical results will also help determine the area that will become part of the Station-managed land use control (LUC) area. Currently, the SRCR will recommend No Further Action (NFA) with land use controls (LUCs).

This Work Plan states the Project Objective under the Sampling Rationale and Analysis Plan is to comply with the FDEP criteria of Risk Based Corrective Action (RBCA) Risk Management Option (RMO) Level II per Chapter 62-780.680(2), Florida Administrative Code (F.A.C.), and achieve NFA with LUCs for the Gasoline and Kerosene Analytical Groups (GAG/KAG) constituents, which include TRPH, VOCs, and PAHs previously detected at this site. The field objectives will be to collect soil samples (initially 7 from 7 soil borings with additional samples as needed) in the area surrounding the above ground storage (AST) tank to determine if GAG/KAG constituents previously identified at Site 413 persist. At the seven proposed soil borings, soil samples will be collected from 0 to 6 inches below land surface (bls), 6 to 12 inches bls, 1 to 2 feet bls, 2 to 3 feet bls, and 3 to 4 feet bls or until groundwater is encountered.

I am in concurrence with the statements made in this document concerning the Work Plan's overall objective and with the stated direction for the Sampling Rationale and Analysis Plan's Project and Field Objectives. However, I do have comments pertaining to these Objectives. The Chapter these sites are being regulated under is 62-770, not 62-780. Also, please follow previously stated FDEP soil sampling SOPs concerning collecting the final soil sample from each boring as close to the water table as possible (I expect this to be within 12 inches of the water table). Finally, I am in concurrence with the Work Plan when it states, following the sampling event, the contractor will submit a combined document titled Confirmatory Soil Sampling and Site Rehabilitation Completion Report (SRCR). This report should contain the

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Land Use Control Implementation Plan for the site either as an appendix or within the Recommendations Section. A figure depicting the LUC boundary should be included.

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 

cc Tim Bahr, FDEP, Tallahassee