

N00207.AR.001493
NAS JACKSONVILLE
5090.3a

U S NAVY RESPONSES TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT SITE INVESTIGATION REPORT FOR POTENTIAL SOURCE OF
CONTAMINATION 45, BUILDING 200 WASH RACK NAS JACKSONVILLE FL
07/18/2011
TETRA TECH NUS



Document Tracking Number 11JAX0163

July 18, 2011

Project Number 112G02686

Remedial Project Manager
Code OPDE3/AW
Department of the Navy
Naval Facilities Southeast
ATTN: Ajax Street, Building 135N
P.O. Box 30A
NAS Jacksonville, FL 32212-0030

Reference: CLEAN IV Contract Number N62470-08-D-1001
Contract Task Order Number JM19

Subject: Response to Comments for Draft Site Investigation Report for Potential Source of Contamination 45, Building 200 Wash Rack, Naval Air Station Jacksonville, Florida

Dear Ms. Wilson:

Tetra Tech NUS, Inc. (Tetra Tech) is pleased to present this letter responding to the comments on the Draft Site Investigation Report for Potential Source of Contamination 45, Building 200 Wash Rack, located within Naval Air Station (NAS) Jacksonville in Jacksonville, Florida, received from various NAS Jacksonville Partnering Team members. The questions and/or comments that have been received by Tetra Tech from the other Partnering Team members by letter are addressed below.

Naval Facilities Engineering Command Southeast

Adrienne Wilson

Comments received November 17, 2010:

1. Executive summary should state what specific contaminants were found above action levels. A reader need not have to review the CDs to obtain this information. Please include this information. It maybe text or table format.

Response: Tables have been added to the Executive Summary for contaminant exceedances.

2. On page ES-3 line 48 please add the word separately between to an evaluate-this will clarify that the risk will be evaluated under OU3 but not under PSC 45.

Response: The text has been corrected.

3. Page 5-1 line 27 please add the word separately between to an evaluate-this will clarify that the risk will be evaluated under OU3 but not under PSC 45 and this will be consistent with my previous comment.

Response: The text has been corrected..

Naval Air Station Jacksonville, Facilities and Environmental Department

Tim Curtin

1. Page 1-5, line 5: Add "buildings" after "contains several".

Response: The text has been corrected.

2. Page 1-5, line 9: Delete "habitation".

Response: The text has been corrected.

3. Page 1-7, line 19: Change "investigation was" to "investigation were".

Response: The text has been corrected.

4. Page 3-6, line 47: Add "s" after "concentration".

Response: The text has been corrected.

5. Page 3-6, line49: Change "director" to "direct".

Response: The text has been corrected.

6. Page 3-6, line 50: Add "the" after "results from".

Response: The text has been corrected.

7. Page 4-4, line 44: Add "s" after "recreationist".

Response: The text has been corrected.

Florida Department of Environmental Protection

David Grabka

1. On page 1-5, line 9, please add the work "or" between the words "presence" and "habitation".

Response:. The text has been corrected.

2. On page 1-5, line 26, the word "plumbing is misspelled.

Response: The text has been corrected.

3. On page 2-1, lines 5 and 6, it says four soil borings, SB-01 through SB-04 were advanced to total depths not exceeding 4 feet below ground surface. Please note that SB-03/DPT-03 is mentioned in the next sentence as having been advanced to 68 feet below ground surface. Also, the soil boring locations are labeled SS01 through SS04 in Figure 2-1, while they are labeled SB01 through SB04 in Figure 3-1.

Response: The text was modified to show that SB-03 was converted to DPT-03 to determine the site lithology, after the soil samples were collected from SB-01 through SB-04. Figure 2-1 was modified and the figures were labeled SB01 through SB04.

4. On page 3-13, lines 109 -112 and 119-120, please elaborate on the occasions where the MDL was reported to exceed the PAL. This discussion could be placed wither in this section or in an Appendix.

Response: The text was modified to address the request contained in comment number 4. Text now reads *“An evaluation was conducted on the MDLs associated with the target analytes reported as not detected at the MDL in soil samples. On 160 occasions, the MDL associated with non-detected results from the surface soil were reported to exceed the PAL; thus, 27.59 percent of the time the MDL, was greater than the PAL. On 160 occasions, the MDL associated with non-detected from the subsurface soil was reported to be greater than the PAL; thus, 27.59 percent of the time the MDL was greater the PAL. The VOC, SVOC and PCB analytical groups presented greatest frequency of occurrence where the MDLs associated, with non-detected results, were above the applicable MDL. This condition did not occur with the metals analytical group.”* Worksheet 15 of the UFP SAP for the RI addresses the condition where the project screening levels are below the MDL; *“The Partnering Team has agreed to accept this data for decision making if results less than the LOQ are "J" qualified and their impact on the attainment of project objectives will be described in the uncertainties section of the Risk Assessment.”*

5. On page 4-1, lines 29-31, it says that the shallow surface soils (0 to 6 inches bgs) are contaminated and that migration of contaminated surface soil via storm water runoff is likely. This is the opposite of what is written on page 4-4, lines 49 and 50, where it says surface soil is not contaminated. I think that what should have been written is that shallow groundwater is contaminated and that because groundwater may be intercepted by storm sewers, the groundwater to surface water pathway may be complete (see page 4-4, line 54).

Response: The text on page 4-1, lines 29-31 was corrected where the word “likely” was replaced by the word “unlikely”. The text on page 4-4, lines 49 and 50, was modified to reflect the comment on shallow groundwater contamination and the potential interception of such by the storm sewers.



TETRA TECH

If you have any questions regarding the enclosed material, or if I can be of assistance in any way, please contact me at (904) 730-4669, extension 213, or by e-mail at Mark.Peterson@tetratech.com.

Sincerely,

Mark A. Peterson
Task Order Manager

- c: Tim Curtin, NAS Jacksonville (hard copy/CD)
- Mike Singletary, NAVFAC SE (hard copy/CD)
- Pete Dao, USEPA (hard copy/CD)
- David Grabka, FDEP (hard copy/CD)
- Hal Davis, USGS (hard copy/CD)
- Chris Pike, Tetra Tech (unbound)
- Debra Humbert, Tetra Tech (cover letter only)
- CTO 0152A Project File