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NAS JACKSONVILLE
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LETTER REGARDING REVIEW COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN
TO SUPPORT EXTENDED SITE INVESTIGATION FOR POTENTIAL SOURCES OF
CONTAMINATION 5, 8, 9, 29, 32 AND 50 NAS JACKSONVILLE FL
6/18/2010
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

June 18, 2010

Mrs. Adrienne Wilson, RPM
NAVFAC EFD SOUTHEAST
Code OPA6, Cube 36
Building 135
NAS Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for Extended Site Investigation for Potential Sources of Contamination 5, 8, 9, 29, 31, 32, and 50, Naval Air Station Jacksonville, Jacksonville

Dear Mrs. Wilson:

The Department is pleased to acknowledge receipt of the Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for Extended Site Investigation for Potential Sources of Contamination 5, 8, 9, 29, 31, 32, and 50, Naval Air Station Jacksonville, dated April 2010 (received April 26, 2010), prepared and submitted by Tetra Tech, Inc. I have the following comments on the Draft Sampling and Analysis Plan:

- (1) In Section 10.8.2, it discusses the previous investigations that occurred at PSC 50. It says in this section that lithologic logs indicate the sludge was noted in a range between 5 and 7.5 feet below ground surface, was visibly distinguishable from the surrounding soil and that the sludge emitted organic vapor analysis readings between 1,000 to 1,200 parts per million. However, the soil sampling strategy as proposed in Sections 11.3, Worksheet #15, Sections 17.1 and 17.8 and Worksheet #18.7 do not take the depth of the sludge or the OVA readings into account. Soil samples are to be collected to a maximum vertical depth of two feet (Section 11.3) or four feet (Section 17.1 and 17.8 and Worksheet #18.7) and are to be analyzed only for PCBs, pesticides and metals; which are contaminants that have low volatility. The proposed depths of soil samples to be collected at PSC 50 appear to be focused on the soil cover over the sludge material and not the sludge material itself.
- (2) SAP Worksheet #18.7 has samples being collected from 0.0 to 0.5 below land surface and 2.0 to 4.0 feet below land surface. This contradicts the sampling depths proposed in Sections 11.3, 17.1 and 17.8.

Mrs. Adrienne Wilson

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- (3) Please note that based on the proximity of PSCs to surface water and the location of particular soil samples to surface water, the Department may compare surface soil results from several of the PSCs to leachability to the freshwater surface water and/or leachability to marine surface water soil cleanup target levels of Chapter 62-777, Florida Administrative Code. Also, SPLP results may be compared to freshwater surface water or marine surface water cleanup target levels based on proximity of the samples to surface water.

If you have any questions, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.

Remedial Project Manager

CC: Pete Dao, EPA Region IV, Atlanta
Tim Curtin, NASJAX
Mark Peterson, TtNUS, Jacksonville
Tim Bahr, FDEP, Tallahassee

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