

N00207.AR.002259
NAS JACKSONVILLE
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN FOR SITE
INVESTIGATION AT POTENTIAL SOURCE OF CONTAMINATION 55 NAS JACKSONVILLE
FL
1/10/2011
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 10, 2011

Commanding Officer
NAVFAC Southeast
Attn: Adrienne Wilson
Code OPA6, Cube 36
Building 135
NAS Jacksonville, FL 32212-0030

RE: Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Site Investigation for Potential Source of Contamination 55, Naval Air Station Jacksonville, Jacksonville, Florida

Dear Adrienne:

I have reviewed the Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Site Investigation for Potential Source of Contamination 55, Naval Air Station Jacksonville, dated December 2010 (received December 23, 2010), prepared by Tetra Tech NUS, Inc. I have the following comments on the Draft Sampling and Analysis Plan (SAP):

- (1) In Table 10-1 on page 30 and 31, the units for the Department's soil cleanup target levels (SCTLs) are presented as $\mu\text{g}/\text{kg}$, where they should be mg/kg . Also, the table lists a residential and an industrial SCTL for calcium, which I do not believe had SCTLs. Also, the table says thallium did not have SCTLs, which I believe is in error. Please check through the entire table and make sure the values shown are correct.
- (2) In Section 11.4, page 41, last sentence of first paragraph, please identify more options that applying LUCs or NFA. Other options could include an Interim Removal Action, the preparation of an EE/CA. Also, please change the word "necessary" with the word "appropriate".
- (3) In SAP Worksheet #15, Matrix Groundwater, Metals Analytical Group, pages 58 and 59, please verify that background groundwater quality at Naval Air Station Jacksonville is as poor as presented in the table. The table indicates background groundwater exceeds the primary MCLs for antimony, arsenic, beryllium,

Mrs. Adrienne Wilson
Draft SAP for PSC 55
Page 2 of 2
January 10, 2011

cadmium, chromium and lead; the secondary MCLs for aluminum, iron and manganese, some by several orders of magnitude; and the GCTL for vanadium.

- (4) In Figure 17-1, page 63, according to the legend yellow dots are proposed sampling locations. There are thirty dots on the figure. However, only ten locations are actual sampling locations. This figure should be cleared up to only depict actual sampling locations. Also, sampling location 55S09 is depicted twice, while sampling location 55S05 is not depicted at all.

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

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager

CC: Tim Bahr, FDEP
Peter Dao, USEPA Region 4, Atlanta
Tim Curtain, NASJAX, Jacksonville
Mark Peterson, Tetra Tech, Jacksonville
Casey Hudson, CH2M Hill, Atlanta

ESN 