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EMAIL REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN PHASE 1 REMEDIAL INVESTIGATION FOR POTENTIAL SOURCE OF CONTAMINATION 38 NAS JACKSONVILLE FL
10/7/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Johnson, Julie

From: Grabka, David [David.Grabka@dep.state.fl.us]
Sent: Friday, October 07, 2011 2:42 PM
To: 'Wilson, Adrienne T CIV NAVFAC SE, JAXS'; tim.l.curtin@navy.mil; Dao.Peter@epamail.epa.gov; Peterson, Mark; Casey.Hudson@CH2M.com; Hal Davis
Cc: Eric.Davis@CH2M.com; Johnson, Julie; Pate, Alan
Subject: PSC 38, Draft UFP SAP for Phase I Remedial Investigation, NAS Jacksonville

Team,

I've looked over the Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Phase I Remedial Investigation for Potential Source of Contamination 38, Torpedo Rework Facility, Naval Air Station Jacksonville, Revision 1, dated August 2011 (received August 11, 2011), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Draft Sampling and Analysis Plan:

(1) The constituents in Otto Fuel II, which is the fuel/propellant used in torpedoes, are dismissed as possible contaminants on page 34. It appears as though the point made on page 34, second paragraph, is that based on site history, the chemicals in Otto Fuel II would not be expected to be found in the environment. In actuality, it appears that the physical properties of the chemicals and their ability to be broken down by micro-organisms in soil and water are the main arguments made. I would like a more thorough evaluation of the work done at the torpedo rework facility, opportunities for spills or mishandling of Otto Fuel II or wastes contaminated with Otto Fuel II (i.e. rags), and where the Otto Fuel II was stored and where drums containing waste contaminated with Otto Fuel II were stored. Otherwise, I feel that dismissing of the chemicals in the Otto Fuel II from laboratory analysis may be construed as deliberately not analyzing for specific chemicals known to have been used at the site because the analytical method is not standard, a laboratory outside of our usual list of laboratories may be needed, or because it going to cost a lot more money to run samples for those non-standard chemicals.

(2) In SAP Worksheet #15, page 70, the PALs for O-xylene and M+P-xylenes is listed as 1,200 ug/L. The Department's GCTL for total xylenes is 20 ug/L.

Those are my only main points. I'm a little iffy about the Proposed Groundwater and Soil Sampling Locations on page 84, because the locations mostly seem to be biased toward a particular direction, but I realize that this is so because of what was detected in the Sampling Event Report and that I may have an opportunity to ask for samples in other parts of the site in a later phase.

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