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LETTER REGARDING REGULATORY COMMENTS ON FINAL SAMPLING AND ANALYSIS
PLAN FOR PHASE 1 REMEDIAL INVESTIGATION OF POTENTIAL SOURCE OF
CONTAMINATION 38 NAS JACKSONVILLE FL
1/13/2012
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

January 13, 2012

Ms. Adrienne Wilson
Code OPDE3/AW
Department of the Navy
Naval Facilities Southeast
Attn: Ajax Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

RE: Final Sampling and Analysis Plan (SAP)(Field Sampling Plan and Quality Assurance Project Plan) for Phase I Remedial Investigation for Potential Source of Contamination 38 (PSC 38), Revision No. 2, Naval Air Station Jacksonville, Jacksonville, Florida

Dear Adrienne:

I have completed my review of the Final Sampling and Analysis Plan (SAP)(Field Sampling Plan and Quality Assurance Project Plan) for Phase I Remedial Investigation for Potential Source of Contamination 38, Revision No. 2, Naval Air Station Jacksonville, dated December 2011 (received December 14, 2012). I have the following comment on the Sampling and Analysis Plan that needs to be corrected before the Department can approve it:

In Section 11.3, page 44, in the description of the vertical boundary of interest for surface soil it says that "The interval of interest for surface soil is 0 to 2 feet bgs for metals and 6 inches to 2 feet bgs for all other analytical groups." It later goes on to say that this is in accordance with FDEP guidance. Rule 62-780.600(5)(c)1., Florida Administrative Code, actually says:

If a surficial discharge of metals or semi-volatile organic compounds is known or suspected, the sampling intervals shall be as follows: land surface to six inches, six inches to two feet, and two-foot intervals thereafter.

Otherwise, the following vertical sampling intervals are directed:

Samples shall be collected at two-foot intervals unless the sampling intervals are adjusted, as necessary, to account for factors such as discrete variations in the lithology,

depth to the water table, the point of discharge, and the chemical and physical properties of the contaminants.

Please make the necessary revisions to the SAP. Changes to the surface soil sampling intervals will also require changes to Section 14.7, Section 17.2, and Worksheet 18.2.

I also have the following minor comments that should also be corrected in the next revision:

- (1) In Section 14.7, third paragraph, page 52, please remove backhoe as a means for collecting surface soil samples. The use of a backhoe as a means to collect surface soil samples is unacceptable except possibly for waste characterization purposes.
- (2) In Section 14.7, third paragraph, page 52, it mentions a Site Geologist who is not listed in earlier Worksheets #4 and #7.

In the responses to my previous comments and in Worksheet #9, page 27, it is explained that the sampling and analysis for propylene glycol dinitrate (PGDN) will be done through a field task modification and that a separate laboratory will need to be procured to conduct the analyses. Please submit a work plan for the Department's review that indicates sampling locations, including the rationale for those locations, the laboratory and laboratory method to be used for analyzing for PGDN, etc.

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

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Pete Dao, EPA Region IV, Atlanta
Tim Curtin, NASJAX
Mark Peterson, TtNUS, Jacksonville
Casey Hudson, CH2M Hill, Atlanta
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