

N00207.AR.003150
NAS JACKSONVILLE
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT TIER II SAMPLING AND ANALYSIS PLAN FOR
MUNITIONS REPOSE PROGRAM REMEDIAL INVESTIGATION OF FORMER MACHINE
GUN RANGE COMPLEX NAS JACKSONVILLE FL

7/9/2012

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

Herschel T. Vinyard Jr.
Secretary

July 9, 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: Draft Tier II Sampling and Analysis Plan, Munitions Response Program,
Remedial Investigation of Former Machine Gun Range Complex, Naval Air
Station Jacksonville, Jacksonville, Florida

Dear Ms. Wilson:

I have completed my review of the Draft Tier II Sampling and Analysis Plan, Munitions Response Program, Remedial Investigation of Former Machine Gun Range Complex, Naval Air Station Jacksonville, dated April 2012 (received April 12, 2012), prepared by Tetra Tech, Inc. I have the following comments on the Draft Tier II Sampling and Analysis Plan:

- (1) In Section 1.0, in the box for the Navy QAO/Chemist, the name Jonathan Tucker should replace TBD.
- (2) In Section 4.3.2, for UXO 1, page 37 of 114, fourth paragraph, last sentence, it says that ten surface soil and five sediment samples also exceeded the tiered select ecological PAL, but it does not state for what contaminant or sum of contaminants there were exceedances.
- (3) In Section 4.3.2, for UXO 1, page 37 of 114, sixth paragraph, it says a 6- to 12-inch layer of skeet fragments was observed at six sampling locations and that no samples were collected from that layer for those 6 samples. Has the Navy considered delineating the area of buried skeet fragments? Has the Navy considered putting a well in the area where the buried skeet fragments were observed?

- (4) In Section 4.3.2, for UXO 3, page 39 of 114, fourth paragraph, same comment as (2) above. Also, in that paragraph, first sentence micrograms per liter should be micrograms per kilogram ($\mu\text{g}/\text{kg}$).
- (5) In Section 4.3.2, for UXO 4, page 40 of 114, first paragraph, last sentence, it says that several metals exceeded their respective PALs at numerous surface soil sampling locations and that several metals exceeded their respective PALs in all of the sediment samples, but it does not state whether human health or ecological PALs are being discussed.
- (6) In Section 4.3.2, for UXO 6, page 42 of 114, fourth paragraph, same comments as in (4) above.
- (7) In Section 4.3.2, for UXO 6, page 42 of 114, last sentence on page, it says "Surface water sampling was recommended to investigate the possible migration of contaminated sediment through the site drainages." Surface water sampling may provide information on how contaminated sediment or discharging contaminated groundwater may be affecting surface water, but unless the surface water samples are collected during a storm event where sediments are entrained in surface water at the time of sampling, the sampling of surface water will be of little value in determining sediment migration. Further sediment sampling along the reaches of those site drainages would be a typical method for investigating sediment contaminant migration and its nature and extent.
- (8) In Section 5.2, subsection 8., page 50 of 114, Project Action Limits, it says that human health risk PALs are based on an incremental lifetime cancer risk greater than 1×10^{-4} or a non-cancer Hazard Index (HI) greater than 1. PALs are based on either the Department's residential soil cleanup target level (SCTL), which is based on an incremental lifetime cancer risk greater than 1×10^{-6} or a non-cancer Hazard Index (HI) greater than 1; or they are based on EPA's Regional Screening Levels (RSLs), which I believe are based on the same criteria but possibly using different exposure assumptions. Also, in the paragraph after the two bullets, it discusses risk management processes that are not relevant to the identification of PALs for the investigation being described in the UFP SAP.
- (9) In Section 5.4, page 54 of 114, **Human Health Risk Assessment**, it says that only if incremental lifetime cancer risks are greater than 1×10^{-4} or hazard quotients of hazard indices are greater than 1, will the Navy proceed to a Feasibility Study. The Department's criteria for incremental lifetime cancer risk is 1×10^{-6} and will identify that criteria and the cleanup target levels based on that criteria as State

Ms. Adrienne Wilson
MMRP Tier II UFP-SAP for RI
July 9, 2012
Page 3 of 3

ARARs. Also, it may be premature in discussing how the data to be collected in the Remedial Investigation will be used in risk assessments in the UFP SAP.

- (10) In Section 7.2, first paragraph, page 60 of 114, please add lead (Pb) to the analyses to be done on groundwater at UXO 2.
- (11) In Appendix B, Correlation Between XRF and Laboratory Lead Data, several figures were missing in my copy.
- (12) In Figures 7-1 through 7-5, the proposed sample locations are depicted. However, the locations are not shown in the context of the previous sampling location and results from the Site Investigation or the sample depths and analyses to be performed specified in the table in Section 8.5. Please devise figures that place into context why the particular sample locations are being proposed and what are the sample depths and analyses to be performed at those locations.

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: Mark Peterson, Tetra Tech, Jacksonville
Casey Hudson, CH2M Hill, Atlanta
Pete Dao, EPA Region IV, Atlanta
Tim Curtin, NASJAX
Tim Bahr, FDEP, Tallahassee

KAW 