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LETTER AND FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS
ON DRAFT SAMPLING AND ANALYSIS PLAN SITE INSPECTION POTENTIAL SOURCE OF
CONTAMINATION 57, SE HIGH POWER TURN-UP PAD NAS JACKSONVILLE FL

3/25/2013

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

March 25, 2013

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 Sampling and Analysis Plan, Site Inspection for PSC 57, S-3 High Power Turn-Up Pad, Naval Air Station Jacksonville, Jacksonville, Florida

Dear Ms. Wilson:

I have completed my review of Draft Sampling and Analysis Plan (SAP), Site Inspection for PSC 57, S-3 High Power Turn-Up Pad, Naval Air Station Jacksonville, dated February 2013 (received February 3, 2013), prepared and submitted by Resolution Consultants. I have the following comments on the Draft SAP:

- (1) On page WS 11-3, second, third and fourth bulleted items on the page, some of the references to the Department's rules are listed incorrectly. I have the same comment on the third bulleted item on page WS 11-4.
- (2) In Figure 17-2, which shows the proposed groundwater sample locations that will be added to the two wells that currently exist (HPTP MW01 and HTP-MW04), it appears that four of the five wells that are to be sampled will be located on the other side of the drainage ditch that surrounds the High Power Turn-Up Pad from the pad itself. I suggest that wells HPTP-MW02 and HPTP-MW03 (wells that currently cannot be located) be replaced with wells in roughly the same location on the High Power Turn-Up Pad side of the drainage ditch.
- (3) It appears that lead was the only inorganic analyte analyzed for in past site assessments. This was appropriate when the conceptual site model only envisioned the discharge of fuels with lead as a possible additive and was investigated pursuant to Chapter 62-770, Florida Administrative Code. Now that the site is being addressed as a potential CERCLA site, please provide a compelling rationale for not determining the possible presence of other inorganic constituents at the site. Please note that the assessment may not be considered complete if questions regarding chemicals not analyzed for still remain.

Ms. Adrienne Wilson
Sampling and Analysis Plan
Site Inspection for PSC 57
Page 2 of 2
March 25, 2013

If you have any questions 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
Eric Davis, CH2M Hill, Atlanta
Todd Haverkost, Resolutions, Jacksonville

KAW

