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NAS JACKSONVILLE
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U S NAVY RESPONSES TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE DRAFT SAMPLING AND ANALYSIS PLAN AMENDMENT REMEDIAL
INVESTIGATION OF FORMER MACHINE GUN RANGE COMPLEX NAS JACKSONVILLE FL
8/6/2013
RESOLUTION CONSULTANTS

**RESPONSES TO COMMENTS
DRAFT SAMPLING AND ANALYSIS PLAN AMENDMENT
REMEDIAL INVESTIGATION OF FORMER MACHINE GUN RANGE COMPLEX
NAVAL AIR STATION JACKSONVILLE
JACKSONVILLE, FLORIDA**

Comments from U.S. Environmental Protection Agency (U.S. EPA) Region 4:

The U.S. EPA approved the Draft Sampling and Analysis Plan (SAP) Amendment (dated March 2013) on 15 May 2013, with no comments.

Comments from Florida Department of Environmental Protection (FDEP):

The FDEP submitted comments on the Draft SAP (dated March 2013) on 10 July 2013. The responses to those comments are as follows.

1. Comment:

WS 14-3, Section 14.5, first paragraph - Soil samples to be analyzed for nitroglycerin should be collected as discrete samples and should not be composited prior to analysis.

Response:

Worksheet #14, Section 14.5 has been revised to state all soil samples will be collected as discrete samples. Worksheets #18 and #20 were also revised to include 20 discrete soil samples that will be collected at UXO Site 4 for nitroglycerin analysis rather than the 2 composite samples previously proposed. The change also required a revision to Figure 7-4 to include the proposed locations of the discrete samples.

2. Comment:

WS 14-4, Section 14.8 -Resolution Consultants SOP 3-12 does not contain well/soil boring abandonment procedures. Please indicate which well abandonment procedures will be used for this fieldwork.

Response:

Worksheet #14, Section 14.8 has been revised to include the following statement: "The wells will be abandoned within 3 days of sample collection by removing the PVC riser and screen before backfilling the borehole with cement/bentonite grout from the bottom up using a tremie pipe."

3. Comment:

WS 18-1, UXO Site 2- Antimony was detected at previous soil sample locations JAX-23A-SBSS008 from 4-5 ft-bls and JAX-23A-SBSS012 from 3-4 ft-bls. To delineate the extent of antimony in soil at UXO Site 2, it is recommended to include the analysis of antimony at proposed soil sample locations X2SB001 through X2SB009.

Response:

Worksheet #18 has been revised to include the analysis of antimony at proposed soil sample locations X2SB001 through X2SB009.

4. Comment:

WS 18-6, UXO Site 4 - SPLP results from soil sample JAX-56-SBS042 detected antimony above the FDEP GCTL of 6 ug/L. The Department recommends including antimony in the analysis of proposed groundwater sample X4TW05.

Response:

Worksheet #18 has been revised to include the analysis of antimony in the analysis of proposed groundwater sample X4TW05.