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U S NAVY RESPONSES TO U S EPA REGION IV AND FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION COMMENTS ON THE DRAFT TIER I SAMPLING AND  
ANALYSIS PLAN SITE INSPECTION FOR POTENTIAL SOURCE OF COTAMINATION 57  
NAS JACKSONVILLE FL  
6/19/2013  
RESOLUTION CONSULTANTS

**RESPONSES TO COMMENTS  
DRAFT TIER I SAMPLING AND ANALYSIS PLAN  
SITE INSPECTION FOR PSC 57, S-3 HIGH POWER TURN-UP PAD  
NAVAL AIR STATION JACKSONVILLE  
JACKSONVILLE, FLORIDA**

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*Comments from U.S. Environmental Protection Agency Region 4:*

The U.S. Environmental Protection Agency (U.S. EPA) approved the Draft Sampling and Analysis Plan (SAP) (dated February 2013) on 9 May 2013, with no comments. The Remedial Project Manager (RPM) provided one additional comment verbally at the May 2013 Tier 1 Partnering Team when the responses to the Florida Department of Environmental Protection (FDEP) comments were discussed. Refer to response to comment #2 for additional details.

*Comments from Florida Department of Environmental Protection:*

The FDEP submitted comments on the Draft SAP (dated February 2013) on 25 March 2013. The responses to those comments are as follows.

**1. Comment:**

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.

**Response:**

The references will be corrected in the following manner:

- Page WS 11-3, second bullet – “The laboratory Practical Quantitation Limit (PQL) should be used if it is less stringent than the Cleanup Target Level (CTL) according to Chapters 62-780.680(1)(b)1.a. and 62-780.680(1)(b)2.a. F.A.C. The PQL, as defined by the FDEP, is the lowest concentration that a laboratory can accurately report on a chemical.
- Page WS 11-3, third – “Apportioned SCTLs in accordance with Chapter 62-780.680(1)(b)1.d.(V)”
- Page WS 11-3, fourth bullet – “95% Upper Confidence Limit approach in accordance with Chapters 62-780.680(1)(b)1.a., 62-780.680(1)(b)1.b., or 62-780.680(1)(b)1.c.”

- **Page WS 11-4, third bullet – “The laboratory PQL should be used if it is less stringent than the CTL according to Chapter 62.780.680(1)(c)1.”**

**2. Comment:**

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 HPTP-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.

**Response:**

Navy and Resolution Consultants personnel were able to locate the previously missing wells (HPTP-MW02, HPTP-MW03, and HPTP-MW05) during a site visit on 30 May 2013. The wells appeared to be in good condition; thus, the need for the replacement wells proposed in the draft Uniform Federal Policy (UFP)-SAP has been eliminated with one exception. The well location southeast of the High Power Turn-up Pad (HPTP) that was previously proposed as a contingency location for the replacement of HPTP-MW03 will be retained as a supplemental sampling location as requested by the U.S. EPA RPM during the May 2013 Tier 1 Partnering Team meeting. The proposed supplemental sampling location is identified as HPTP-TW01<sup>1</sup> in the revised version of the UFP-SAP. Worksheets 14, 17, 18, and 20 as well as Figure 17-2 have been updated to indicate that groundwater samples will be collected from all five existing wells and from the one proposed supplemental well location. Per the proposed sampling strategy, soil samples will also be collected during the installation of HPTP-TW01. The aforementioned worksheets and Figure 17-1 have been revised to include the changes to the proposed soil sampling program.

**3. Comment:**

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

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<sup>1</sup> This is the same location that was previously identified as HPTP-TW03 in the draft UFP-SAP. The location was renamed when the need for the other contingency well locations was eliminated.

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.

**Response:**

**The proposed analytical suite has been revised to include a select list of metals due to the potential for the release of used oil associated with historical operations at the site. The select list, commonly referred to as the eight Resource Conservation and Recovery Act metals, includes arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver. Worksheets 9, 10, 11, 12, 15, 17, 18, 19, 20, 21, 23, 24, 25, 28, 30, and 36 have been revised to address the change.**