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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING SITE ASSESSMENT REPORT REVISION 1 FOR SITE 413 NS
MAYPORT FL
7/18/2008
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 18, 2008

Ms. Beverly Washington
Department of the Navy
Naval Facilities Engineering Command Southeast
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Site Assessment Report, Revision 1, Site 413, Naval Station MAYPORT, Mayport, Florida (Tetra Tech NUS, Inc., March 19, 2007)

Dear Ms. Washington:

I have reviewed the subject document dated March 19, 2007 (received March 20, 2007). The purpose of this site assessment was to evaluate the presence or absence of petroleum hydrocarbons in subsurface soils and groundwater at Site 413 that may have resulted from releases from the 560-gallon heating oil aboveground storage tank (AST), associated piping system, and/or a former sump associated with this system. The Florida Department of Environmental Protection (FDEP) cannot concur with Tetra Tech NUS, Incorporated's (Tetra Tech) stated recommendation of No Further Action for Site 413. My comments and recommendations for the direction at Site 413 are below.

- 1. Section 2.4, SOIL QUALITY ASSESSMENT, 2.4.2, field Screening Procedures, Page 2-2:** Soil samples, whether for screening purposes or analysis, should be collected as close to the water table as possible. Even if this means collecting samples within what Tetra Tech is defining as the "capillary region" of the water table (if it is "dry" then Soil Cleanup Target Levels would apply).
- 2. Section 2.5, GROUNDWATER ASSESSEMENT METHODS, 2.5.1, DPT Grab Samples (Phase I), Page 2-4:** Tetra Tech should still use FDEP standard operating procedures (SOP) for purging when collecting direct push groundwater samples. This allows for better comparisons to the groundwater samples collected from temporary or permanent monitoring wells.
- 3. Section 2.5, GROUNDWATER ASSESSEMENT METHODS, 2.5.2.3, Groundwater Sampling, Page 2-7:** Tetra Tech should review the Groundwater Sampling (FS 2200) portion of the FDEP Standard Operating Procedures (SOP) for the purging criteria located on pages 8 through 10, Sections 2. (STABILIZATION MEASUREMENT FREQUENCY) and 3. (PURGING COMPLETION) (Revision Date: February 1, 2004) for better purging and sampling procedures in the future. Other comments concerning groundwater sampling are: 1) Tubing should have been placed 1 foot into the water column. 2) Why the arbitrary 3 minutes in between parameter reading collection times? SOP states every quarter casing volume after the initial one casing volume. 3) Casing volume is correct (Why use liters? The flow cell is graduated in liters?), however, then

barely a casing volume is purged before the sample is collected. This does not follow the FDEP SOP.

4. **Section 3.4, GROUNDWATER ANALYTICAL RESULTS, 3.4.1, Mobile Laboratory, Page 3-7:** It is my opinion that the direct push data, groundwater analyzed by the mobile lab, is more representative of contaminant(s) concentration(s) in groundwater at the site. This is most likely due to where the sample was collected within the water column. In this case, the sample was collected closer to the top of the water column (see comment 3).
5. **Section 3.4, GROUNDWATER ANALYTICAL RESULTS, 3.4.2, Fixed-Based Laboratory, Page 3-9:** It is my opinion that the monitoring well data, groundwater analyzed by the fixed-based lab, is not representative of contaminant(s) concentration(s) in groundwater at the site. This is most likely due to where the sample was collected within the water column. The sampling data sheets show that Tetra Tech collected these samples approximately 3.5 feet below the water table (Example: water table at MW-2S is at 4.19 feet below top of casing and the sample tubing was placed at 7.55 feet).
6. **Section 6.0, RECOMMENDATIONS, Page 6-1:** I cannot concur with Tetra Tech's recommendation of No Further Action at Site 413. It has been documented by Earth Systems and Tetra Tech that there is petroleum contamination above and below the water table. Earth Systems collected both soil and groundwater samples that contained levels of petroleum compounds above their respective cleanup target levels. The direct push groundwater samples collected by Tetra Tech were analyzed by the mobile lab and the contaminant concentrations showed a good correlation to the groundwater sample collected by Earth Systems. This information documents contaminated media in the area around the water table which is approximately 3 feet bls to approximately 6 feet bls. I recommend resampling the monitor wells using approved FDEP procedures for purging and sampling of groundwater. These samples should be collected from monitor wells MW3S, MW4S, MW5S, and MW6S. Upon the receipt of the analytical data Site 413 should be reevaluated.

Thank you for the opportunity to review this document. If you require additional clarification or other assistance please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.
Remedial Project Manager



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