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LETTER AND CONCURRENCE FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL WORK PLAN FOR CONFIRMATORY SAMPLING AT
AREA OF CONCERN G AND H (AOCG) (AOCH) NS MAYPORT FL

1/25/2011

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 L. Vinyard, Jr.
Secretary

January 25, 2011

Department of the Navy
Naval Facilities Engineering Command Southeast
Attn: Mr. Brian Syme, OPC 6
135 Ajax Street North, Building 135
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

**RE: Final Work Plan, Confirmatory Sampling at AOCs G and H, Naval Station
Mayport, USEPA ID #FL9 170 024 260, Mayport, Florida (AEROSTAR,
November 2010)**

Dear Mr. Syme:

I have reviewed the subject document dated November 2010 which was received on December 2, 2010, and was completed under Contract Number N62467-06-D-0123. The objective of this project is to perform site assessment activities at Areas of Concern (AOCs) G and H. AOC G is located at Building 265. The facility is utilized for vehicle maintenance by the Navy Exchange (NEX). The floor drains associated with the NEX Service Station formerly discharged to an adjacent storm water drainage ditch located to the south of the facility. The floor drains have been closed and filled with grout. AOC H is located behind Building 1553. This is an area designated for testing hydraulic jack stands. The test area consists of concrete slabs covered by canopies and asphalt access roads. The concrete and asphalt are at the same elevation, which has allowed hydraulic oil, that has spilled from testing the jack stands, to flow over the concrete and asphalt toward a storm water box inlet located adjacent to the test area. The Navy states that current operations reduce the potential for a release into the environment.

The scope of work in the Work Plan includes: 1) installing up to 11 soil borings in the vicinity of the storm water drainage ditch located adjacent to AOC G, 2) installing up to 8 soil borings in the vicinity of the jack stand test area located a AOC H, 3) all soil borings will be field screened using an Organic Vapor Analyzer (OVA) from land surface to approximately one foot into the water table, 4) collect soil samples at six inches, two feet, four feet, and six feet below land surface from each soil boring, 5) soil sample laboratory analysis will include EPA Method 8260 for VOCs, EPA Method 8270 for SVOCs, the 13 Priority Pollutant Metals, and total recoverable petroleum

Mr. Brian Syme

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hydrocarbons (TRPH) by the FL-Pro Method, 6) the installation of one monitoring well at each AOC and the collection of one groundwater sample. Each monitoring well is to be installed from the location showing the highest OVA result or where visual evidence of contamination is seen (such as stained soils), 7) groundwater sample laboratory analysis will include EPA Method 8260 for VOCs, EPA Method 8270 for SVOCs, the 13 Priority Pollutant Metals, and TRPH by the FL-Pro Method, 8) a Confirmatory Sampling Report will be prepared in accordance with Chapter 62-780, Florida Administrative Code (F.A.C.) and submitted to FDEP.

I concur with the Navy and AEROSTAR that site assessment activities need to be conducted at AOCs G and H to determine whether No Further Action (NFA) without institutional or without institutional and engineering controls is warranted under the rules outlined in Chapter 62-780, F.A.C. However, I am not in concurrence with the scope of work outlined in the Work Plan. First, the Draft and Final Work Plan documents for the confirmatory sampling activities were not made available to me/FDEP for review and concurrence prior to their start and completion. The stated project schedule in this document has the Final Work Plan being completed before November 8, 2010 and confirmatory sampling activities completed before November 22, 2010. At the January 2011 Naval Station Mayport Partnering Team meeting, Naval Facilities Engineering Command Southeast personnel confirmed that these activities had already been completed. Also, had I been able to review and comment on the Work Plan I could have informed the Navy and AEROSTAR which portions of the Work Plan were insufficient to satisfy the objectives/requirements outlined in 62-780.600. These deficiencies will be outlined by me upon my review of the subsequent report once it is received by my office.

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



ESN 

cc Tim Bahr, FDEP, Tallahassee