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LETTER REGARDING REVIEW AND COMMENTS FROM FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION OF DRAFT TIER II SAMPLING AND ANALYSIS PLAN
INTERIM MEASURE REMEDIAL ACTION FOR UNDERGROUND STORAGE TANKS SITE 24
AND SITE 19 NAS PENSACOLA FL

6/20/2014

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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SECRETARY

June 20, 2014

Mr. William Neimes
Remedial Project Manager
ITP Gulf Coast
Naval Facilities Engineering Command Southeast
Attn: AJAX Street, Building 135N
Post Office Box 30A
Jacksonville, Florida 32212-0030

RE: Draft Tier II Sampling and Analysis Plan, Interim Measure Remedial Action for UST Site 24 and Site 19, Revision No. 00, Naval Air Station Pensacola, Pensacola

Dear Bill:

The Department has reviewed the Draft Tier II Sampling and Analysis Plan (SAP), Interim Measure Remedial Action for UST Site 24 and Site 19, Revision No. 00, Naval Air Station Pensacola, dated March 2014 (first draft received electronically March 31, 2014; fully signed draft received electronically April 7, 2014), prepared by AGVIQ-CH2M HILL Constructors, Inc. Joint Venture III. I have the following comments on the Draft Tier II SAP:

- (1) In the list of acronyms, please correct the definition of the acronym FDEP. Please also correct the definition of the acronym NAIP to read “natural attenuation indication (or indicator) parameter”.
- (2) In Worksheet #5, page 23, the listed chemicals of concern for UST Site 19 include lead. Lead is not a listed analyte for UST Site 19 in any other part of the Draft Tier II SAP. Please determine whether or not lead should be analyzed for at UST Site 19.
- (3) In Worksheet #6, page 25, bottom of the page, please remove 3-(1,8-naphthalimido)propyls as a chemical to be analyzed in groundwater at UST Site 24.
- (4) In Worksheet #6, page 28, please add as a Data Quality Objective statement that if contamination is detected above groundwater cleanup target levels in compliance wells defining the aerial extent of contaminant plumes, then new compliance wells will be added to the sampling and analysis plan in order to provide plume definition. This is necessary as biosparging may push contamination about in the aquifer, sometimes in directions not naturally downgradient. It is important that this effect be measured. Please note that this may require either the addition of already existing wells or the installation of new wells.

Mr. William Neimes
Draft Tier II Sampling and Analysis Plan
Interim Measure Remedial Action for UST Site 24 and Site 19
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- (5) In Worksheet #10, page 49, the groundwater cleanup target levels, and therefore the Project Action Limits, for cis- and trans-1,2-dichloroethene are reversed.
- (6) In Worksheet #10, pages 50 and 53, the units for the Project QL Goal should be $\mu\text{g/L}$.

Please make the requested changes or otherwise address the above comments in the Draft Final version of the Tier II SAP. If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
DoD and Brownfields Partnerships
Waste Cleanup Program

cc: Greg Campbell, NAS Pensacola
Hector Hernandez, CH2M Hill, Navarre
Allison Harris, Resolutions Consultants
Gerry Walker, Tetra Tech, Tallahassee

KAW

