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NAS PENSACOLA
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS ON SAMPLING AND ANALYSIS PLAN FIELD SAMPLING PLAN
AND QUALITY ASSURANCE PROJECT PLAN GROUNDWATER/SURFACE WATER
INTERFACE OPERABLE UNIT 2 SITES 11 AND 30 JULY 2010 NAS PENS
12/13/2010
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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

131
Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

December 13, 2010

Ms. Patty Marajh-Whittemore
Naval Facilities Engineering Command Southeast
Post Office Box 30
Building 903
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Groundwater/Surface Water Interface, Operable Unit (OU) 2 - Sites 11 and 30, Naval Air Station Pensacola, Pensacola, Florida.

Dear Ms. Marajh-Whittemore:

The Department has reviewed the Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Groundwater/Surface Water Interface, Operable Unit (OU) 2 - Sites 11 and 30, Naval Air Station Pensacola, dated July 2010 (received August 4, 2010), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the Sampling and Analysis Plan:

- (1) On page 8, Section 10.2, Site 11, second paragraph, the language explaining the selected remedy regarding contaminated soil removal is contradictory and unclear. The paragraph should be reworded.
- (2) On page 39, Section 11.3, Site 11 and Site 30 Vertical Boundaries, it says the vertical boundary of groundwater associated with these sites ranges from ground surface at the edge of the wetland to a maximum depth of approximately 30 feet. On page 32, top of page, it says the shallow zone extends from the water table to 50 feet bgs or the dark green marine clay. In SAP Worksheet #18.1 on pages 62 and 63, several DPT points are identified as extending to 35 feet bgs. This different depths should be resolved for the extent of the shallow zone.
- (3) In SAP Worksheet #15 on page 51 and SAP Worksheet #17 on pages 58 and 59, a very limited list of metals are identified for analyses. They include arsenic, barium, beryllium, cadmium, chromium and vanadium. As this project is to investigate the groundwater/surface water interface, the inclusion of barium and vanadium, which have no promulgated surface water criteria is curious. Also,

the inclusion of arsenic and beryllium as analytes to be investigated is also curious, as they do not appear to have been identified as chemicals of concern in groundwater per Figure 10-1 on page 34 and arsenic's surface water cleanup target level is greater than it's groundwater cleanup target level. Lastly, two inorganics, lead and iron, are shown on Figure 10-1 as having been detected at concentrations above their groundwater cleanup target levels and surface water cleanup target levels in monitoring wells to be sampled as part of the groundwater/surface water interface investigation, but these analytes are not identified as being part of the investigation.

- (4) In SAP Worksheet #18.1, the DPT screen intervals are specified as either 10 feet (5-15 feet bgs or 25-35 feet bgs) or 15 feet (20-35 feet bgs). Please ensure these DPT screen intervals are correct.

If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Greg Fraley, EPA Region 4, Atlanta
Gerald Walker, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola
Sam Naik, CH2M Hill, Atlanta

JJC  ^{for} ESN 