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NAS SAUFLEY FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN FOR
UNDERGROUND STORAGE TANK SITE 2406 NAS SAUFLEY FL
03/05/2012
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 T. Vinyard Jr.
Secretary

March 5, 2012

Mr. John Schoolfield
Naval Facilities Engineering Command Southeast
ITP Gulf Coast
Naval Facilities Engineering Command Southeast
Attn: AJAX Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

RE: Draft Sampling and Analysis Plan for Underground Storage Tank Site 2406,
Outlying Landing Field Saufley, Naval Air Station Pensacola, Pensacola, Florida

Dear Mr. Schoolfield:

I have reviewed the Draft Sampling and Analysis Plan (SAP) for Underground Storage Tank Site 2406, Outlying Landing Field Saufley, dated September 2011 (received by e-mail on September 14, 2011), prepared and submitted by CH2M Hill Constructors, Inc. I have the following comments on the Draft SAP:

- (1) On Worksheet #2, it says the site is being addressed under the CERCLA regulatory program. I believe it should state that the site is being addressed under the State of Florida's Petroleum Cleanup Program as implemented under Chapter 62-770, Florida Administrative Code.
- (2) In Worksheet #4, my phone number is correct. In Worksheet #9, it is incorrect.
- (3) In Worksheet #10, it says that wells at Saufley monitor the shallow, intermediate and deep zones of the surficial aquifer (Sand and Gravel aquifer). Based on the total depth of the Sand and Gravel aquifer and the depths of monitoring wells, is that statement correct or is do the terms shallow, intermediate and deep reflect their vertical relationship to each other rather than to the overall depth of the Sand and Gravel aquifer.
- (4) In the Executive Summary and Worksheet #10, it says that the six 20,000 gallon USTs were located downgradient of PW04. Is this correct? I was under the

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impression that PW04 was located downgradient of the USTs. It would help to have a figure depicting groundwater flow in the SAP.

- (5) It appears that no documentation of the proper closure of the six USTs and their associated pipeline has been found. Has any investigation as to the current condition of the USTs been conducted?
- (6) The second goal specified in the SAP is to measure free product thickness. However, it does not identify with what instrument, with what precision, and by what procedure free product is to be measured. It also does not identify how groundwater is to be sampled from wells where measurable free product has been identified. The Department's Standard Operating Procedures would seem to suggest collecting groundwater samples with a bailer. If groundwater is not to be sampled from monitoring wells where measurable free product has been detected, the SAP should so state.

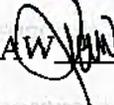
If you have any questions, please contact me at (850) 245-8997.

Sincerely,



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

CC: Sam Naik, CH2M Hill, Atlanta
Frank Lesesne, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola

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