

N60234.AR.000126
NAS SAUFLEY FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS ON DRAFT SAMPLING AND ANALYSIS PLAN FIELD SAMPLING
PLAN AND QUALITY ASSURANCE PROJECT PLAN GROUNDWATER AND SOIL SAMPLING
SITE 5 NAS SAUFLEY FIELD FL
02/01/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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

136
Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

February 1, 2011

Ms. Sarah Reed
Naval Facilities Engineering Command Southeast
Code OPZE3
Building 903
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Groundwater and Soil Sampling, Site 5, Saufley Field, Pensacola, Florida

Dear Ms. Reed:

I have completed my review of the Draft Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Groundwater and Soil Sampling Plan, Site 5, Saufley Field, dated December 2010 (received December 17, 2010), prepared and submitted by Tetra Tech, Inc. I have the following comments on the Draft Sampling and Analysis Plan:

- (1) The groundwater and subsurface soil sampling plan takes what was approved in the Alternate Procedures Request to perform a closure assessment of the fuel distributions lines and refueling pits and adds in potential site assessment activities in accordance with Chapter 62-770, Florida Administrative Code (F.A.C.). I have no problem with the potential additional site assessment work as long as what was specified in the approved Alternate Procedures Request is conducted.
- (2) The Draft SAP that was submitted to the Department only had the Tetra Tech Project Manager's signature on Worksheet #1. Usually, Draft SAPs that are submitted should have already been signed by the Tetra Tech Quality Assurance Manager and the NAVFAC Quality Assurance Office/Chemist. Please make sure you obtain all the required signatures.
- (3) The Project Action Limits (PALs) for soils specified in Section 11.2, page 35, are the direct exposure and leachability soil cleanup target levels (SCTLs). If one

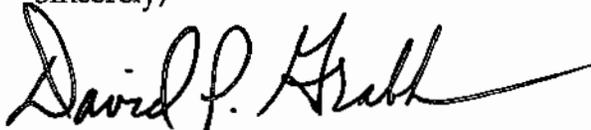
Ms. Sarah Reed
UFP-SAP for Site 5, Saufley Field
February 1, 2011
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compares this to the PALs located in Section 15.2.1 and 15.2.2, pages 54 and 55, only the leachability to groundwater SCTLs are listed. Some contaminants, notably benzo(a)pyrene and dibenzo(a,h)anthracene, have residential or commercial/industrial direct exposure SCTLs that are lower than their respective leachability to groundwater SCTLs. Only TRPH, located in Section 15.2.3, has a PAL reference to the Department's residential SCTL. Please explain.

- (4) Please review Section 11.4.2, page 37, Groundwater Decision Rule, second bullet, where it discusses three soil step outs.
- (5) In Section 15.2.4, TRPH Speciation, in the column listing the PAL Reference, please change "STCL" to "SCTL".
- (6) On Figure 17-1, there are a great many monitoring wells depicted. Could some of these wells be used to determine whether soil contamination has caused groundwater contamination or be used for delineation purposes? Of course this would depend on where the monitoring wells are located with respect to any identified soil contamination and what depth they are screened.

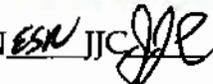
If you have any questions, please contact me at (850) 245-8997.

Sincerely,



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

CC: Bill Gates, Charleston, SC
Frank Lesesne, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola

ESN  JJC