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NAS SAUFLEY FIELD
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RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS
ON FINAL SAMPLING AND ANALYSIS PLAN FIELD SAMPLING PLAN AND QUALITY
ASSURANCE PROJECT PLAN GROUNDWATER AND SOIL SAMPLING SITE 5 NAS
SAUFLEY FIELD FL
03/10/2011
TETRA TECH



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PITT-03-11-017

March 10, 2011

Project Number 112G02748

Naval Facilities Engineering Command Southeast
ATTN: Ms. Sarah Reed (OPZE3)
Integrated Product Team South Central
Building 903
Jacksonville, Florida 32212-0030

Reference: CLEAN Contract Number N62470-08-D-1001
Contract Task Order Number JM26

Subject: Final 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:

Tetra Tech NUS, Inc. (Tetra Tech) is pleased to submit two copies (with CDs) of the enclosed Final Sampling and Analysis Plan (SAP) for Site 5, which incorporates formal comments received from FDEP in a letter dated February 1, 2011. The FDEP letter was written by David Grabka who serves as the remedial project manager for Saufley Field. The comments received from FDEP were incorporated into the SAP, approved via e-mail from FDEP on February 23, 2011, and are summarized below.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION (FDEP)

FDEP Comments from David Grabka

- (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.

Response: Comment noted. At a minimum, the work specified in the Alternated Procedures Request will be completed. Additional site assessment will only be conducted if contamination is found to exist.

- (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.

Response: All required signatures will be included on Worksheet #1 in the Final SAP.

- (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 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.

Response: The tables in Section 15.2.1 and 15.2.2, pages 54 and 55, have been updated to reflect that PALa specified in Section 11.2. Specifically, three corrections were made.

- Dibenzo(a,h)anthracene will now reference the Residential SCTL of 0.1 mg/kg.
 - Benzo(a)pyrene will now reference the Residential SCTL with a PAL of 0.1 mg/kg. The PQL value was updated to 0.033 mg/kg.
 - The PAL (2,500 mg/kg) listed for benzo(g,h,i) pyrene was incorrectly referenced. It was corrected to reference the Residential SCTL.
- (4) Please review Section 11.4.2, page 37, Groundwater Decision Rule, second bullet, where it discusses three soil step outs.

Response: The second bullet in Section 11.4.2, page 37, was corrected to reference groundwater step outs and not soil steps outs in the Groundwater Decision Rule.

- (5) In Section 15.2.4, TRPH Speciation, in the column listing the PAL Reference, please change "STCL" to "SCTL".

Response: Correction was made.

- (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.

Response: Existing monitoring wells may be used to determine whether soil contamination has caused groundwater contamination and/or delineation purposes. If soil contamination is found near an existing monitoring well, groundwater data from that well will be reviewed to determine if any connection can be made. Existing monitoring well data may also be used during the groundwater delineation efforts if step-outs are taken toward existing monitoring wells. If contamination is found and a monitoring well network is required for Site 5, the location and use of existing wells will be utilized in the design of the monitoring well network.

Upon issuance of this Final SAP, we will proceed with scheduling and initiating the fieldwork as soon as possible.

If you have any questions, please call me at (901) 523-9500.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Geoff Pope'.

Geoff Pope, P.E.
Project Manager

Enclosure (1 paper, 1 CD)



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Cc: David Grabka, FDEP (1 paper, 1 CD)
Greg Campbell, NASP PWD (2 paper, 2 CD)
Gerry Walker, Tetra Tech (2 paper, 2 CD)
Geoff Pope, Tetra Tech (1 paper, 1 CD)
Hector Hernandez, CH2MHILL (1 CD)
Sam Naik, CH2MHILL (1 CD)
File (1 paper, 1 CD)
John Trepanowski, Tetra Tech/CLEAN Contract No. N62470-08-D-1001, CTO JM26 (letter only)