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NAS WHITING FIELD  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON FORMER GUNNERY AND SKEET RANGE SAMPLING AND ANALYSIS  
PLAN FOR MUNITIONS RESPONSE SITE INSPECTIONS AT SMALL ARMS RANGE NAS  
WHITING FIELD FL  
9/21/2009  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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2600 Blair Stone Road  
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Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

September 21, 2009

Mr. John Schoolfield, P.E.  
Department of the Navy  
Naval Facilities Engineering Command Southeast  
Building 903  
Yorktown/Langley  
Jacksonville, Florida 32212-0030

**RE: Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for Munitions Response Program (MRP) Site Inspections at Small Arms Ranges, Former Gunnery Area and Skeet Range, Naval Air Station Whiting Field, USEPA ID #FL2 170 023 244, Milton, Florida (Tetra Tech NUS, Inc., August 5, 2009)**

Dear Mr. Schoolfield:

I have reviewed the subject document dated August 5, 2009, and received by email on August 19, 2009. Although I concur in general with the sampling methodology for how the Site Inspections (SI) are to be conducted at these sites (Former Gunnery Area and Skeet Range), I do not concur with the Navy's problem statement/problem definition (Section 10.4, page 39) and the goals/objectives of the study (SAP Worksheet #11, page 41).

Currently, these sites are under the SI portion of the CERCLA process. As stated in this document, USEPA Guidance defines the SI objective as determining the absence or presence of contamination (see page 27 of this document). During visual surveys of both the Former Gunnery Area and Skeet Range, target fragments (small pieces of broken clay pigeon targets) were observed on the ground surface at each site, and at the Skeet Range, a stockpile of broken clay targets and lead pellets were also noted. I believe this is enough evidence to show there is contamination present at these sites, thereby most likely negating the premise that the results of the SI would support a No Further Action (NFA) decision. Therefore, I recommend that you re-evaluate your goals/objectives of the SI. If you decide that the goals/objectives are to document that the visual remnants of targets and pellets have leached contamination into media at the site, then you could have a more focused SI than presently proposed. If you want to characterize the site during the SI to maximize resources, then you would have to expand the present plan to incorporate additional sampling points. If you still believe an NFA decision could be reached after the SI, then you need to further explain your rationale and provide additional information to support that presumptive outcome. At a minimum, I anticipate that the removal of the visual clay pigeon pieces and pellets at the sites would be necessary. To expedite the review and approval of an SI proposal, I recommend that we have a conference call as soon as possible to discuss my concerns and comments.

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Sampling Analysis Plan  
Naval Air Station Whiting Field, Munitions Response Program Site Inspections  
September 21, 2009

Thank you for the opportunity to review this document. If you require additional clarification or other assistance, please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.  
Remedial Project Manager

cc Tim Bahr, FDEP, Tallahassee

JJC 

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