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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT WORK PLAN REVISION NUMBER 2 OPERABLE UNIT 2  
(OU2) FOR VAPOR INTRUSION SCREENING EVALUATION NAS JACKSONVILLE FL  
4/12/2012  
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

April 12, 2012

Ms. Adrienne Wilson  
Code OPDE3/AW  
Department of the Navy  
Naval Facilities Southeast  
Attn: Ajax Street, Building 135N  
P.O. Box 30A  
Jacksonville, FL 32212-0030

RE: Draft Work Plan, Revision No. 02, Operable Unit 3 Vapor Intrusion Screening Evaluation, Naval Air Station Jacksonville, Florida

Dear Ms. Wilson:

I have completed my review of the Draft Work Plan, Revision No. 02, Operable Unit 3 Vapor Intrusion Screening Evaluation, Naval Air Station Jacksonville, dated March 2012 (received March 23, 2012), prepared and submitted by AGVIQ-CH2M Hill Constructors, Inc. Joint Venture III. The Draft Work Plan included as Appendix A a Draft Sampling and Analysis Plan for Phase II Vapor Intrusion Investigation. I have the following comments on the Draft Work Plan:

- (1) Sections 1 through 3 discusses how the Navy has ranked and prioritized the 37 buildings of interest identified in the Operable Unit 3 Phase I Vapor Intrusion Screening Evaluation Report. This effort identified those buildings most likely to have vapor intrusion issues and receptors that could be exposed to those vapors. The top 12 buildings prioritized by the method described in Section 3 have been selected for Phase II sampling and analysis. The proposed buildings are acceptable to the Department.
- (2) The rest of the Draft Work Plan and the Draft Sampling and Analysis Plan discuss the investigation strategy and sampling procedures to be used to collect data that can be used to evaluate where significant vapor intrusion pathways may be present and where adverse risks from inhalation of indoor air may exist. The methodology proposed seems reasonable and is acceptable to the Department.

- (3) In Section 5, it states that subslab air samples for radon analysis will be collected in a 1-L Tedlar bags using a lung box (Section 5.3.2) and indoor and outdoor air will be collected using a bomb box (Section 5.4.2). Please verify if different equipment is being proposed. The Draft Sampling and Analysis Plan, Worksheet #14, would indicate that a lung box would be used for subslab and indoor and outdoor air samples for radon analysis. In the CH2M Hill SOPs, they are called Air Sampler Boxes.
- (4) In Figure 3-7, the inset figure showing the layout of Building 101N is incorrectly labeled as being Building 101D.
- (5) In Figure 3-10, the inset figure shows only a portion of Building 103. Please explain why an interior view of part of Building 103 is not provided.
- (6) In Figure 3-13, same comment as (5) above for Building 795.
- (7) Worksheet #1 of the Draft Sampling and Analysis Plan has no signatures. Please make sure that the required signatures have been received prior to submitting the Draft Final version of this document.
- (8) In Worksheet #17 of the Draft Sampling and Analysis Plan, I could not always reconcile the number of subslab and indoor air samples with the locations depicted in Figures 5-1 through 5-4 of the Draft Work Plan.

Please note that the Department has not developed vapor intrusion guidance (VIG) or policy as of this date. Therefore, the Department's review of this document has been only cursory in order to determine whether the work proposed appears to be a rational and defensible approach to determining whether vapor intrusion may be adversely affecting indoor air in buildings associated with Operable Unit 3. While the investigation of vapor intrusion is well outside my area of expertise, the proposed approach appears reasonable to me.

If you have any concerns 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

Ms. Adrienne Wilson  
OU 3 Phase II Vapor Intrusion Screening Evaluation  
April 12, 2012  
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CC: Mark Peterson, Tetra Tech, Jacksonville  
Casey Hudson, CH2M Hill, Atlanta  
Pete Dao, EPA Region IV, Atlanta  
Tim Curtin, NASJAX  
Tim Bahr, FDEP, Tallahassee

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