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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ON DRAFT SITE INVESTIGATION REPORT FOR POTENTIAL SOURCE OF CONTAMINATION 55 (PSC55) NAS JACKSONVILLE FL
10/11/2012
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

October 11, 2012

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OCT 19 2012

TETRA TECH NUS, INC.
JACKSONVILLE, FL

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 Site Investigation Report for Potential Source of Contamination 55, Naval Air Station Jacksonville, Jacksonville, Florida

Dear Adrienne:

I have completed my review of the Draft Site Investigation Report for Potential Source of Contamination (PSC) 55, Naval Air Station Jacksonville, dated August 2012 (received September 4, 2012) prepared and submitted Tetra Tech, Inc. I have the following comments on the report:

(1) The number of chemicals of potential concern (COPCs) detected in either surface/ subsurface soil or groundwater above human health project action limits (PALs) is quite limited. I would propose that the Navy limit further horizontal and vertical delineation efforts to only those COPCs that were identified as exceeding human health PALs in the Site Investigation (see Table 3-1). This would focus further assessment and analyses to a select group of metals and would eliminate the expense of collecting samples for laboratory analysis for volatile organic compounds, semi-volatile organic compounds and polychlorinated biphenyls.

(2) Because contamination above PALs has been identified at PSC 55 and documented in the Site Investigation Report, further work at the site should be conducted pursuant to the NAS Jacksonville Federal Facilities Agreement. Upon EPA and Department approval of the Site Investigation Report, please provide a schedule of future planned activities for PSC 55 beginning with the Remedial Investigation Work Plan.

(3) On page 3-1, Table 3-1, most of the metals are denoted as exceeding their ecological soil PALs. This includes metals such as aluminum, calcium, iron, magnesium, manganese and sodium. I am not aware that those metals are typically of ecological concern. Please identify how ecological soil PAL exceedances were calculated for metals. Could some of the exceedances indicate that the metals were detected above NAS Jacksonville background concentrations rather than exceeding an EPA ecological screening value?

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

CC: Pete Dao, EPA Region IV, Atlanta
Tim Curtin, NASJAX
Mark Peterson, TtNUS, Jacksonville
Casey Hudson, CH2M Hill, Atlanta

KAW