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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FIELD SAMPLING PLAN, WORK PLAN, QUALITY ASSURANCE
PROGRAM PLAN, FIELD MANAGEMENT OF INVESTIGATIVE DERIVED WASTE
MANAGEMENT PLAN, HEALTH AND SAFETY PLAN AND ADDITIONAL ASSESS

3/6/1997

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Building
2800 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 6, 1997

Mr. David Driggers
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, SC 29419-9010

file: 191&15c.doc

RE: Field Sampling Plan; Work Plan; Quality Assurance Program Plan; Field Management of Investigative Derived Waste (IDW); Health and Safety Plan - Additional Assessment Using Innovative Technology/Methodology at the SWMU 15 and Building 191 Area, ICON Environmental Services, NAVSTA Mayport, February 1997.

Dear David:

I have reviewed the above documents dated February 1997 (received February 24, 1997) and have grouped my comments as follows: documents that are suitable; documents that are suitable but which are questionable; and, documents which are not suitable.

The following documents are suitable for their intended purpose, with the following minor comments:

Field Management of Investigative Derived Waste (IDW)

1. Section 4.3 indicates that "historical data from existing monitoring wells will be used to segregate non-contaminated water from contaminated water." I suggest that the data from existing wells are old and may not reflect the presence or lack of contamination at this time, keeping in mind the fact that ground water is mobile. Prudence would suggest that water from any well at an IRP site would be considered contaminated until analysis shows otherwise. The Navy should insure that proper disposition is afforded all IDW produced during this assessment.

Health and Safety Plan

2. Due to the remote location of SWMU 15, egress and ingress paths may vary from a nearby gate that is open during the lunch hour to a circuitous route around the runway, golf course, LAMPS hanger and fire station. I suggest that because of the use of subcontractors, these aspects should be better described and could be accompanied by a map.

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Site Management Plan

No comment.

Work Plan

3. Slug tests on DPT wells (even if they could be accomplished) are likely to yield questionable data. Additionally, using a down-hole video assessment of *one* direct push well will yield significant data only for that particular well.

The following document is questionable for use in the Mayport IRP Program:

Field Sampling Plan

4. The plan (and other documents) discusses the installation of three conventional monitoring wells at each site. No conventional wells are proposed to confirm DPT data from the deep zone, presently estimated at approximately 50 feet at Building 191, a DNAPL site. I have previously (my comment letter of January 19, 1997) discussed the *possible* need for additional wells. I am concerned that the present Plan does not propose a well in the deep zone, which is counter to the spirit of the NELP innovative technology initiative and, more important, to Department policy of requiring the use of conventional wells for conformation of screening data. For the record, screening data not confirmed by conventional wells remains screening data. This was outlined very plainly in my letter of January 19.
5. A peristaltic pump is proposed for ground water sampling. See comments regarding the Quality Assurance Program Plan (below).
6. As previously mentioned in my letter of January 19, 1997, use of OVA field headspace analyses on ground water samples may yield data of questionable use.
7. Evaluating the innovative technology aspects of this project in the absence of deep conventional well data is questionable.

The following document is not suitable for use in the Mayport IRP Program:

Quality Assurance Program Plan

8. The following is my previous comment (number 6) in my letter of January 19, 1997:

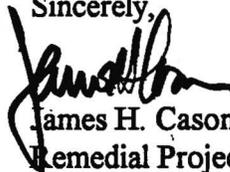
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"I cannot tell if the contractor has a Florida-approved Quality Assurance Plan. Merely paraphrasing or stating that the FDEP SOPs are adopted or will be followed is not sufficient. Please refer to Chapter 62-160 (3), F.S. for clarification. Such a plan, when approved, will be issued a Florida Certification Number which should be referred to when discussing the Plan or when documenting actions undertaken subsequent to the plan. In checking the January 2, 1997 Department List of Approved Contractors, I did not find a listing for "ICON." If the plan has been approved after this date or in another name, please document the approval number."

This document does not satisfy the requirements of Chapter 62-160.110 (3), F.S. Instead, various FDEP SOPs continue to be referenced as guidance, as I have previously discussed. An example as to why an approved QA/QC Plan is necessary is illustrated by the following: the proposed QA/QC Plan, Section 4.4, page 7, indicates that " a sample will be obtained using the peristaltic pump.." For reference, please consult Standard Operating Procedures for Laboratory Operations and Sample Collection Activities, DEP-QA-001.92 (commonly referred to as the "SOPs"). Section 4.0 discusses Sampling Procedures. Section 4.2.5.6 discusses Groundwater Sampling Techniques, and describes the approved use of a peristaltic pump to obtain certain types of samples. Careful examination and familiarity with the SOPs would reveal that a peristaltic pump is not approved for sampling VOCs and this is mentioned several times in the document. For example, in Section 4.2.9., temporary well points and DPT technology are discussed and the proper manner of obtaining a VOC sample using Teflon tubing and a gloved finger, not a peristaltic pump, is described. Referencing the SOPs and applying them properly are two different things.

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-4230.

Sincerely,



James H. Cason, P.G.
Remedial Project Manager

Enclosure: (1) Chapter 160, F.S.

cc: Cheryl Mitchell, NAVSTA Mayport
Martha Berry, EPA Region IV, Atlanta
Satish Kastury, FDEP, Tallahassee
Jerry Young, City of Jacksonville

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