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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL SAMPLING AND ANALYSIS PLAN FOR GROUNDWATER
BACKGROUND STUDY NS MAYPORT FL
12/4/2012
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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December 4, 2012

Naval Facilities Engineering Command Southeast
Attn: Mr. Dana Hayworth (OPUE3), Remedial Project Manager
135 Ajax Street North, Building 135
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Final Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan), Groundwater Background Study, Naval Station Mayport, Facility ID# 16-8626008, USEPA ID #FL9 170 024 260, Mayport, Florida (Tetra Tech, October 24, 2012)

Dear Mr. Hayworth:

I have reviewed the subject document which was dated October 24, 2012 and was received on October 25, 2012. This report was prepared under Contract Task Order Number JM71. According to the document *"This Sampling and Analysis Plan (SAP) encompasses the Field Sampling Plan and Quality Assurance Project Plan (QAPP) requirements for a background study to determine the naturally occurring concentrations of metals in the surficial aquifer at Naval Station (NAVSTA) Mayport located in Jacksonville, Florida..."* The report continues *"This SAP outlines the principal points of contacts for each organization, project management, objectives, planned activities, measurement, data acquisition, assessment, oversight, and data review procedures associated with conducting a background study of the groundwater for metals at NAVSTA Mayport. Protocols for well installation, sample collection, handling and storage, chain-of-custody, laboratory and field analyses, data validation, and reporting are also addressed in this SAP."*

In the Problem Statement section of the report it states *"As a result of historical activities at NAVSTA Mayport, groundwater in the shallow aquifer has been impacted by different classes of chemicals (i.e., semivolatile organic compounds [SVOCs], volatile organic compounds [VOCs], and pesticides), including metals. The target analytes that have exceedances above GCTLs in the shallow aquifer include aluminum, ammonia, antimony, arsenic, chromium, iron, lead manganese, silver, sulfate, thallium, vanadium, and zinc, which have been reported with historical exceedances above FDEP GCTLs since sampling began in the 1980s. The cause of the target analyte concentrations occurring at levels above the FDEP GCTLs in the shallow aquifer is not clearly understood, and may be related to natural concentrations in the aquifer and not related to base activities. Hence, a groundwater background study of the condition with respect to these target analytes is being conducted."* It goes on to state *"The purpose of this SAP is to*

determine the background concentrations of these target analytes in groundwater and present the results in a Background Groundwater Study Report. The DQO objectives for this study were presented to the Partnering Team in March 2012 (see Appendix A) and were accepted to move forward with preparing this SAP."

The Analytical Approach section discusses two Decision Rules for the Background Study. Decision Rule #1 states *"If analysis of the groundwater data produces technically defensible and reliable estimates of the background concentration ranges for each target analyte, then provide in the Groundwater Background Study Report the following: background maximum, mean, twice mean, summary statistics, recommended Substantial Differences, and guidance for comparative analysis."* Decision Rule #1 continues by stating *"If the groundwater data does not provide acceptable background ranges, then identification of deficiencies will be conducted by the Partnering Team, the collection of additional data will be conducted, and the analysis steps will be repeated."* Decision Rule #2 states *"If acceptable background concentration ranges are determined, then the Groundwater Background Study Report will present the Individual Comparisons Method and the Comparative Method (FDEP, 2009; Navy, 2004) as guidance to discern a difference between historical and future site data and naturally occurring background concentrations."*

I am in concurrence with the Final Sampling and Analysis Plan for conducting the Groundwater Background Study for metals at NAVSTA Mayport as outlined in this report. No response to comments from Tetra Tech were necessary for the Draft Final Sampling and Analysis Plan document since FDEP did not supply comments to this Draft Final document.

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
Federal Program Section

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cc Tim Bahr, FDEP, Tallahassee