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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW AND COMMENTS ON DRAFT FINAL SAMPLING AND ANALYSIS PLAN INJECTION
OF EMULSIFIED OIL SUBSTRATES (EOS AND AQUABUPH) FOR IN-SITU
BIOREMEDIATION AT STUDY AREA (SA) 17 NTC ORLANDO FL
4/5/2011
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 5, 2011

BRAC PMO SE
Attn: Mr. Art Sanford
4130 Faber Place Drive
Suite 202
North Charleston, SC 29405

RE: Draft Final Sampling and Analysis Plan, Injection of Emulsified Oil Substrates (EOS® and AquaBupH™) for In-Situ Bioremediation at Study Area 17 (SA-17), Former Naval Training Center Orlando, Orlando, Florida.

Dear Mr. Sanford:

I have completed my review of the Draft Final Sampling and Analysis Plan, Injection of Emulsified Oil Substrates (EOS® and AquaBupH™) for In-Situ Bioremediation at Study Area 17 (SA-17), Former Naval Training Center Orlando, dated January 2011 (received January 26, 2011), prepared and submitted by Solutions-IES, Inc. I have the following comments on the Draft Final Sampling and Analysis Plan:

- (1) SAP Worksheet #2, where the regulatory program is to be specified, it incorrectly identifies Florida's Petroleum Cleanup Rule, Chapter 62-770, Florida Administrative Code (F.A.C.).
- (2) SAP Worksheet #10, page 21, first paragraph, please change "was rack" to "wash rack". On the same page, please identify that SA-17 received treatment using Fenton's Reagent prior to the use of EOS® at the site.
- (3) SAP Worksheet #11, Section 11.1, page 23, third Remedial Action Objective, please fix the sentence to read that people and the environment are to be protected by reducing and preventing exposure to site contaminants rather than the other way around.
- (4) SAP Worksheet #14, page 31, in the section on **Monitoring and Injection Well Installation and Development**, it incorrectly identifies SA-17 as being in the St. Johns River Water Management District. It should be the South Florida Water

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Management District. On that same page near the bottom, please change "navy" to "Navy".

- (5) Please identify the proper labeling of drums in the **IDW Management** section of SAP Worksheet #14, page 33.
- (6) SAP Worksheet #17, page 42, rationale for the anions analyte group, please remove one "that".
- (7) Worksheet #18, pages 75 and 76, Corrective Action for MS/MSD errors, please change the word "ion" to "in".

If you have any questions 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: Teresa Grayson, Tetra Tech NUS, Oak Ridge, TN
Jessica Keener, Solutions-IES, Raleigh, NC

JJC  ESN 