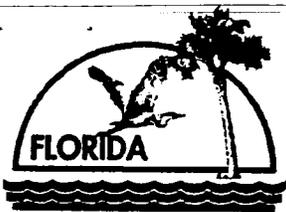


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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON FEASIBILITY STUDY
FOR OPERABLE UNIT 3 (OU 3) NAS JACKSONVILLE FL
8/19/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

0027 - 2562

Jeb Bush
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

August 19, 1999

Mr. Dana Gaskins
Code 1857
SOUTHDIV
2155 Eagle Drive
North Charleston, South Carolina 29406

RE: Feasibility Study for Operable Unit 3. NAS
Jacksonville, Florida

Dear Mr. Gaskins:

Mr. Greg Brown and I have completed the review of the above referenced document dated May 1999 (received June 9, 1999) and have the following comments.

General Comment

1. In general, the FS is a comprehensive report; however, it appears that the authors missed an important fact. The Feasibility Study appears to disregard the fact that a groundwater treatment system *already* operates at OU-3. Both Buildings 106 and 780 plumes have been undergoing treatment since earlier this year and, according to the FS authors, appear to be operating successfully (page 8-4). Disregarding an existing groundwater remedial system and, in the engineering economic analysis, treating those plumes where groundwater extraction is feasible (Areas B, C, and D) with their own separate treatment systems we believe may be in error. The groundwater extraction alternatives for the above areas should, in our opinion, have considered groundwater extraction and storage whereby groundwater is extracted, stored, and the existing system at 106 and 780 is modified to accept and treat extracted water from the above referenced plumes. Based upon previous discussions with HLA and the Station's personnel, it appears that groundwater extraction and storage prior to its treatment is already occurring. We recommend that an evaluation of utilizing the existing remedial system at Buildings 106 and 780 as the

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existing remedial system at Buildings 106 and 780 as the sole remedial system for Areas B, C, and D be developed and compared against other technologies.

Specific Comments

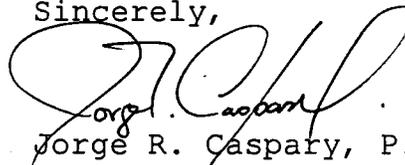
2. Page 8-4: a table showing the operation of the remedial systems at Buildings 106 and 780 should be provided.
3. Table 9-3: the Class III freshwater criteria for Trichloroethene (TCE) is based on an average of annual flow conditions at the point of compliance. For further details please see Section 200, Chapter 62-302, F.A.C.
4. Page 9-12: while the ultimate RAO for the storm sewer water will likely not change, we recommend adding "Upon sampling results," as an introduction to the RAO statement.
5. Page 9-17: the text discusses Area H; however, we could not find a figure describing where said area is located.
6. Page 9-20: based upon comment 3 above, the in-situ requirements for storm sewer water may have to be met if sampling events demonstrate continued exceedances of the surface water standards.
7. Table 9-10: if the TCE surface water criteria is based on an annualized average of flow, then it is conceivable that the amount of FOTW-treated water and subsequent post-treatment amount of effluent may be able to reduce the TCE criteria to below surface water standards.
8. Page 10-23: please include in the sewer alternatives "monitoring" and perform an economic analysis to justify its possible selection. Note, the "cured in place" alternative should be maintained as a separate alternative if the surface water monitoring program reveals violations of applicable standards.
9. Table 10-4, Areas A, E, F, and G: we recommend the Navy consider enhanced biodegradation coupled with monitored natural attenuation. Results indicate that aerobic and anaerobic biodegradation are effective in Area A. Increasing microbial counts at the hottest areas of the plume coupled with monitoring of perimeter wells should have been considered as a potential effective technology.

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10. Table 10-4, area C: chemical oxidation is eliminated because "the large and separate nature of the two interconnected zones of contamination". No other technical reasons are provided. We recommend that chemical oxidation be evaluated for both separate plumes (one centered close to CW16 and the other around MW31). The appropriate calculations and economic analysis should also be submitted. If this is not feasible, then evaluate chemical oxidation for a single plume as shown on Figure 4-9 of the RI.

If I can be of any assistance in this matter, please contact me at 904/488-3935.

Sincerely,



Jorge R. Caspary, P.G.

cc: Doug McCurry, EPA-Atlanta
Tim Curtin, NAS Jacksonville
Lissa Miller, HLA-Jacksonville
Greg Roof, TTNUS-Jacksonville

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