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NAS JACKSONVILLE
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LETTER REGARDING U S NAVY RESPONSES TO REGULATORY THIRD NOTICE OF
DEFICIENCY FOR OLD PLATING SHOP NAS JACKSONVILLE FL
10/13/1993
NAS JACKSONVILLE

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Code 184BR
13 OCT 1993

Mr. Stanley Tam
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7577

RE: RESPONSE TO THE THIRD NOTICE OF DEFICIENCY FOR NAS JACKSONVILLE OLD
PLATING SHOP, BUILDING 101 AND WASTE OIL TANK 101-3 CLOSURE PERMIT

Dear Mr. Tam:

In response to your letter of September 14, 1993, we have addressed your recent comments below and have enclosed the requested changes to the permit application. Four complete copies of the permit are provided.

- 1. page L-5 - The intent (comment #2 of WL93-0413HW16NED) was that the text "...filtration, and stabilization to establish concentration limits" for F006 should read "...filtration, and stabilization to concentration limits established for each constituent.", similar to the text for F007 and F008.

Response: Agree; revised page L-5 is enclosed.

- 2. part I, pages T-2 & T-3 - For further clarification, the last two sentences of page T-2, paragraph 1 should be replaced with "Decontamination of the electroplating facility building and investigation of the surrounding soils and ground-water will be addressed under the Comprehensive Environmental Response, Compensation Liability Act (CERCLA), for which RCRA will be an ARAR."

Also, add language to the last sentence of page T-3, paragraph 1, to state that RCRA will be an ARAR to the CERCLA remediation program.

Response: Agree; revised Part I pages T-2 and T-3 are enclosed.

- 3. part I, page T-8 - In the August 31, 1993 response, it appears that lines of text are missing between paragraphs 1 and 2 of this page.

Response: Agree; revised Part I page T-8 is enclosed.

bcc:
111 (2) 181CP (2) 184BR ✓ 184S

12 OCT 93 FED RASPET/alm

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4. part I, pages T-14, T-15 and T-16 - These pages had the sampling types and sample containers information presented in tabular form, and it needed to be revised to add the samples required from Building 101 itself. Although this information (2 pages) was submitted as part of the response, it was titled "Table 5 Sampling Types" and was marked as "Part II Page 10A". The title and page markings are incorrect. The information should have been incorporated into pages T-14, T-15 and T-16.

Response: Agree; revised Part I pages T-14, T-15 and T-16 are enclosed.

5. part II, Table 2-1 - The only amendment made to Table 2-1 was the inclusion of Method 8010 as the analytical method to be used. There is still no information on the proposed sampling method(s) for Tank 101-3. The "sheet flow" reference is incorrect since it was a sample type for Building 101 (part I), and cannot be applied to an aboveground storage tank in any case. The sampling method(s) for Tank 101-3 should be included in part II, Attachment T. Also, delete footnote #1 which refers to Attachment M, and verify the page number of Table 2-1.

Response: Agree; Table 2-1 has been revised and the page number corrected on the enclosed Part II page T-8.

6. part II, page T-6, item 6 - Although the Navy has agreed with the Department (comment #9 of WL93-0414HW16NED), the text of this page has not been revised.

Response: Agree; revised part II page T-6 is enclosed.

7. Work Plan. A copy of the work plan will be provided under separate cover.

We appreciate your assistance in the timely review of this response. If you have any questions, please contact Mr. Bill Raspet, Facilities and Environmental Department at 772-2717.

Sincerely,

KEVIN H. GARTLAND
Director, Environmental Division
By direction of the Commanding Officer