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NAS JACKSONVILLE
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT REMEDIAL
INVESTIGATION FEASIBILITY STUDY WORK PLAN FOR OPERABLE UNIT 2 (OU 2) NAS
JACKSONVILLE FL
8/24/1992
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



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August 24, 1992

Mr. Joel G. Murphy
Code 18213
Department of the Navy
Southern Division
Naval Facilities Engineering Command
P.O. Box 10068
Charleston, South Carolina 29411-0068

~~1130-0887~~

Re: Draft Remedial Investigation/Feasibility Study Work Plan.
Operable Unit 2, Naval Air Station, Jacksonville, Florida
June, 1992

Dear Mr. *Joel* Murphy,

We have had a chance to review the draft of the above referenced document, and offer the following comments.

Section 1.1 (Site Description) - p. 1-6 and Section 3.1.1 (Description and Background) - p. 3-2

These sections refer to the Fire Fighting Training Area (PSC-2) as being under construction. At our visit in July, 1992, we were told the new facility was completed. The wording should refer to the construction as being finished.

Section 4.1.2.1 (Chemical Specific ARARs) - p. 4-6

- 1) Florida Surface Water Quality Standards (FSWQS) (Chapter 17-302, F.A.C.), as well as Federal Ambient Water Quality Criteria (AWQC) should be included as ARARs. If a particular contaminant is listed in both the FSWQS and the AWQC, the lowest value of the two should be used for analysis and/or detection limits.
- 2) There are no regulatory criteria established for sediments. However, the USEPA has established some guidelines. Also, a study performed by Long and Morgan for the National Oceanic and Atmospheric Administration provides values which could be used relating to sediment contamination analysis (Long and Morgan).
- 3) Table 4-1 (Preliminary Chemical Specific ARARs) should include FSWQS and AWQC for surface water.

Section 4.3.1 (Human Health Risk Assessment Data Requirements) -
p. 4-18

Rec The first paragraph on p. 4-18 includes "and ingestion of shellfish from the St. Johns River." Shellfish are not the only species consumed from the river. You should change "shellfish" to "aquatic organisms." ✓

Section 4.3.2 (Ecological Risk Assessment Data Requirements -
p. 4-26

EC The first paragraph on p. 4-26 refers to potential routes of exposure. You need to include dermal contact of sediments/soils as a possible exposure route. Many organisms (e.g., worms; snails;) live in soils and sediments and could absorb contaminants through the skin. This also includes reptiles who crawl on or live within the soils. ✓

Section 5.2.1.3 (Surface Water/Sediment Sampling) - p. 3-5

✓ PCRB
A11 This section should indicate what contaminants will be analyzed. A full parameter of constituents should be screened (i.e., Total Compound Lists, Total Analyte Lists, etc.).

Section 5.2.1.9 (Survey) - p. 5-14

The National Geodetic Vertical Datum of 1929 is out of date. Topographic elevations should be based on the National Geodetic Surveys most recent adjustment, North American Datum (NAD) 1983.

Section 5.2.2.5 (Polishing Pond for Waste Water Treatment (PSC-42))
- p. 5-24

✓ PCRB
A11 The last paragraph of this section needs to define what constituents will be analyzed for surface water and sediments (SW/SD). It states the constituents to be analyzed for soils, but not SW/SD.

Section 5.2.2.9 (St. Johns River Surface Water and Sediment -
p. 5-31

The document states SW/SD samples will be taken at the shoreline of the river. Some groundwater, in the near vicinity of the river bank, likely leaches at the shoreline. However, due to the distance that the various Potential Sources of Contamination (PSCs) are from the river, PSC contaminants may leach further offshore as any contaminants in the surficial groundwater are probably deeper within the upper surficial layer. We suggest alternating samples along the

shoreline (e.g., near shore, offshore, near shore, etc.).

A map also needs to be included which shows the location of the proposed SW/SD samples.

Section 5.5.2.1 (Contamination Identification) - p. 5-60

The list of contaminants of concern (COC) relating to the ecological risk assessment needs to be based upon the contaminants impact to biological organisms rather than humans. This can be determined from AWQC, FSWQS, USEPA Sediment Quality Criteria, and the Long and Morgan study.

Section 5.5.2.3 (Ecological Exposure Assessment) - p. 5-61 and Table 5-3 (Overview of Exposure Pathways)

- RISC
- 1) The last paragraph on page 5-61 states, "In selecting receptors, an effort will be made to select species that are (1)....., (2) omnivorous and carnivorous, and (3)....." Item "(2)" should also include selection of herbivorous species.
 - 2) Table 5-3 identifies for each PSC a potential contaminated medium (i.e., soils; surface water; sediment), a route of exposure for that medium, and the possible population exposed to the medium. For soils, the population exposed to incidental ingestion of contaminated soils needs to also include invertebrates (e.g., worms). For surface water (SW) and sediment (SD), the population exposed to dermal contact with SW/SD needs to also include aquatic reptiles and mammals.

Section 5.5.2.4 (Ecotoxicity Assessment) - p. 5-65

You need to also include FSWQS as information available to evaluate chemical toxicity in surface water.

Section 7.1 (Authority and Responsibilities) - p. 7-1

This section identifies each person responsible for various areas of the remedial process for NAS Jacksonville. You should also include the person representing the Department of Defense/U.S. Navy natural resource trustee interests. The Department of Defense is identified as a Natural Resource Trustee under the CERCLA/SARA.

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Appendix I-B - Field Sampling Plan (OU-2 Site Specific Field Sampling Plan for Naval Air Station Jacksonville, Florida, June 1992) - Section 4.7 (Topographic Survey) - p. 4-37

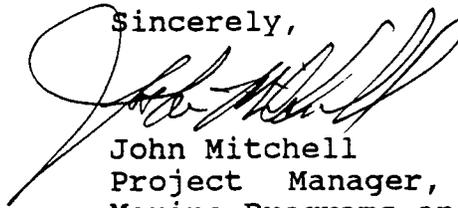
680
The National Geodetic Vertical Datum of 1929 is out of date. Topographic elevations should be based on the National Geodetic Surveys most recent adjustment, North American Datum (NAD) 1983.

General Comments

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At the Technical Review Committee (TRC) meeting in June, 1992, you stated there would also be SW/SD sampling performed in the drainage ditch/swale area to the east of the treatment plant. This ditch parallels the north/south runway and a taxi-way. This should be included in the work plan.

We appreciate the ability to review the plans for N.A.S. Jacksonville. Should you have any problems or concerns with our comments and requests, please contact me at (904) 488-7454.

Sincerely,



John Mitchell
Project Manager, Office of
Marine Programs and Planning

cc: Pamela McVety, FDNR
Waynon Johnson, NOAA
Lynn Griffin, FDER
Eric Nuzie, FDER
Kevin Gartland, USN
James Hudson, EPA
Jim Lee, DOI
Pat Kingcade, FDNR

References:

Long, E.R. and Morgan, L.G. 1991. The Potential for Biological Effects of Sediment-sorbed Contaminants Tested in the National Status and Trends Program. NOAA Technical Memorandum NOS OMA 52. 230 pp.

Florida Department of Environmental Regulation. 6/18/92. Surface Water Quality Standards. Chapter 17-302, Florida Administrative Code. 86 pp.