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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON FINAL DRAFT  
REMEDIAL INVESTIGATION FEASIBILITY STUDY FOR OPERABLE UNIT 3 (OU 3) NAS  
JACKSONVILLE FL  
7/7/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

013  
WP

# Department of Environmental Protection

0134-7559

Lawton Chiles  
Governor

Twin Towers Building  
2000 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 7, 1994

~~119 0007~~

Mr. Joel Murphy  
Code 11518  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
P.O. Box 190010  
Charleston, SC 29419-9010

Dear Mr. Murphy:

The enclosed comments on the Final Draft Remedial Investigation and Feasibility Study, OU 3, NAS Jacksonville complete the Department's review. I previously sent you comments from Mr. Jorge R. Caspary, the Remedial Project Manager. These new comments, from Mr. Bill Neimes of our Engineering Support Section, should be combined with Mr. Caspary's, and together, document the Department's concerns on the referenced document. Both reviewers' comments need to be adequately addressed before we can consider approval of it.

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

Sincerely,

Eric S. Nuzie  
Federal Facilities Coordinator

ESN/st

Enclosure

cc: Jorge Caspary  
Bill Neimes  
Brian Cheary  
Jerry Young  
Kevin Gartland  
Ashwin Patel  
James Hudson

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Florida Department of  
Environmental Protection

Memorandum

To: Eric Nuzie  
Federal Facilities Coordinator

From: Bill Neimes *w/*  
Engineering Support Section

Bureau of Waste Cleanup

Date: June 22, 1994

JUN 27 1994

Subject: Final Draft Remedial Investigation and Technical Review Section  
Feasibility Study, OU3, NAS Jacksonville

I have reviewed the subject document dated April 1994 and prepared by ABB Environmental, Inc. I apologize for the delay in reviewing this document. Because this document discusses both proposed remedial investigation and feasibility study work, I concentrated my review on only the feasibility study portion of this document.

Also included in this document is a Chapter entitled "Accelerated Threat Reduction Action" (Chapter 8). This chapter includes information on selecting a remedial activity to reduce the contaminant concentration at highly contaminated areas. All of my comments are from this chapter.

1. I agree with the type of remediation proposed in this Chapter. I believe that since most of the contaminants are volatile, air sparging and soil vapor extraction will be an effective method of remediation although I am not certain how effective bioremediation will be. My uncertainty with bioremediation of chlorinated organics stems from the lack of empirical data available to indicate its effectiveness.

2. 8.3.2(4) (Page 8-10). I don't believe that a multiple test is necessary for determining the vapor extraction design parameters. If one well is monitored correctly, the information provided by the testing of this well is typically enough so that the remedial system can be designed properly. Additional testing will probably only provide redundant information.

3. 8.3.4 (Page 8-11). I am not sure whether the Department will accept the addition of nitrogen to stimulate anaerobic microbial activities. The additional of nitrogen to the groundwater may result in a nitrate problem in the groundwater.

cc: Jorge Caspary