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LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON TECHNICAL
MEMORANDUM ON PREFERRED REMEDIAL ALTERNATIVE FOR OPERABLE UNIT 2 (OU
2) NAS JACKSONVILLE FL
7/20/1994
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

AUG 20 1994

0142-7559

RECEIVED

AUG 1 1994

~~cc: P. ...~~
~~J. Brown~~
~~M. Lambert~~
PTE
da

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dana Gaskin
Remedial Activities Branch
Department of the Navy - Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 6155
Charleston, South Carolina 29411-0068

C. PERRY

SUBJ: Technical Memorandum on Preferred Remedial Alternative
for Operable Unit 2, Naval Station Jacksonville, Florida

Dear Mr. Gaskin:

The U.S. Environmental Protection Agency has completed its review of the Technical Memorandum for Preferred Remedial Alternative for Potential Source of Contamination (PSC) 2 (Former Fighting Training Area), at Naval Air Station (NAS) Jacksonville, Florida.

If you have any questions or comments about this matter, please contact me at the above address or call me at (404) 347-3555, extension 6448.

Sincerely,

James W. Hudson
Remedial Project Manager

Enclosure

cc: Eric Nuzie, FDEP
Jorge Caspary, FDEP
Kevin Gartland, NAS Jacksonville
James Malone, SOUTHDIYNAVFACENCOM

Post-It™ brand fax transmittal memo 7671		# of pages	3
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General Comments

The Tech Memo presents a preferred remedial alternative description and Interim Remedial Action (IRA) performance criteria for PSC 2. As stated in the Tech Memo, the objective of this document is to summarize existing site conditions, performance criteria and institutional requirements in sufficient detail to permit a Remedial Action Contractor to recommend appropriate means, methods and techniques, and to prepare a competitive cost proposal for the project. However, because of misuse of governing regulations, the Tech Memo fails to meet its objective of establishing valid IRA performance criteria.

1. The Tech Memo incorrectly cites the FAC 17-770 and FAC 17-775 as site ARARs and derives the IRA performance criteria from these rules. However, as stated clearly in these rules, the cleanup criteria contained in the FAC 17-770 and FAC 17-775 apply only to petroleum or petroleum product contamination, but shall not apply to petroleum or petroleum products contaminated with significant quantities of other substances, such as the contaminants encountered in PSC 2. As the Former Fire Fighting Training Area, PSC 2 was used to burn obsolete vehicle chassis and parts to simulate airplane crashes. Besides petroleum products, waste oils and other spent fuels were also used at PSC 2. Because of the nature of these wastes and their residuals, the FAC 17-770 and FAC 17-775 are deemed nonapplicable and should not be used as site ARARs.
2. The Tech Memo should be redeveloped by incorporating essential information collected during the site Focused RI/FS, including the results and conclusions of the focused risk assessment. In addition, a valid set of ARARs should be developed. The risk assessment results and ARARs should then be used to establish quantitative remedial action objectives (RAOs) which in turn would govern the IRA performance criteria.

Specific Comments

1. Pages 2-1 through 2-3, Section 2.2: A summary of the results of the focused risk assessment, conducted as part of the Focused RI/FS for PSC 2, should be presented and discussed in this section. This information is important since it forms the basis for the development of risk-based RAOs which can then be used to select treatment technologies and to establish treatment standards.
2. Pages 2-3 through 2-6, Section 2.3: The Tech Memo describes that one of the RAOs for the soil at PSC 2 is to "reduce petroleum contamination in the vadose zone soils at PSC 2 to reduce human and ecological receptor exposure to soil contaminants and to mitigate the potential release of contaminants to groundwater." Lacking quantitative standards, this RAO is too vague to execute. Please explain

how the treatment technology will be selected and how treatment standards will be established based on such non-quantitative terms. Regarding the use of FAC 17-770, see General Comment No. 1.

3. Pages 3-1 and 3-5, Section 3.1, Table 3-3: The RAO presented in the Tech Memo on contaminated soil cleanup standard "50 mg/kg or less of TRPH" is a partial and misleading citation of the FAC 17-775.400, and thus is unacceptable. According to FAC 17-775.400, the criteria for clean soil with respect to TRPH is "not exceed 10 mg/kg" or "not exceed 50 mg/kg... provided the total of the Polynuclear Aromatic Hydrocarbons (PAHs) does not exceed 1 mg/kg... and the total of the Volatile Organic Hydrocarbons (VOHs) does not exceed 50 ug/kg..." In addition, the clean soil criteria include specified treatment standards for Total Volatile Organic Aromatics (VOAs) and metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver). All these standards must be met in order to fulfill the requirements in the FAC 17-775.400. Concerning the applicability of the FAC 17-775.400, see General Comment No. 1.
4. Pages 3-5, Table 3-3: For PAHs, the cleanup criterion of 6 mg/kg exceeds the 1 mg/kg standard specified in the FAC 17-775.400.
5. Pages 3-10, Paragraph 6, Section 3.4.2: Appendix D contains no such figure as Figure D-1. The appropriate reference for the zone of soil excavation is Figure A-3 in Appendix A.
6. Pages 3-11, Paragraph 1, Section 3.4.2: Appendix D contains no such figure as Figure D-1. The appropriate reference for the horizontal extent of contaminated soils is Figure 2-1.