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LETTER REGARDING REGULATORY REVIEW OF PRELIMINARY DRAFT REMEDIAL  
INVESTIGATION FEASIBILITY STUDY WORK PLAN FOR OPERABLE UNIT 3 (OU 3) NAS  
JACKSONVILLE FL  
2/22/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

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

February 22, 1994

Virginia B. Wetherell  
Secretary

0102-7559

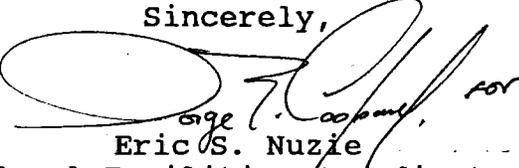
Mr. Joel Murphy  
Code 1853  
SOUTHVAVFACENGCOM  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

Dear Mr. Murphy:

The Department has received and reviewed the Preliminary Draft RI/FS for Operable Unit 3 (OU-3) Work Plan (Sections 1 and 2) for NAS Jacksonville. I have enclosed a memorandum addressed to me from Mr. Jorge Caspary. It documents our comments on the referenced report.

If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,

  
Eric S. Nuzie  
Federal Facilities Coordinator

Enclosure

cc: James Hudson, EPA-Atlanta  
Kevin Gartland, NAS Jacksonville  
Peter Redfern, ABB-Jacksonville

Memorandum

Florida Department of  
Environmental Protection

TO: Eric S. Nuzie, Federal Facilities Coordinator  
Bureau of Waste Cleanup

THROUGH: Dr. James J. Crane, PG Administrator *JJC*  
Technical Review Section

FROM: Jorge R. Caspary, Remedial Project Manager *J.R.C.*  
Technical Review Section

DATE: January 20, 1994

SUBJECT: Review of Preliminary Draft RI/FS Operable Unit 3 Work  
Plan. Sections 1 and 2. Naval Air Station Jacksonville.

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I have reviewed the subject document and submit these comments for the Navy's consideration.

**GENERAL COMMENT**

The documents presents a compilation of assessment efforts conducted at this Operable Unit from 1984 to 1993. All efforts conducted to date seem to indicate that there is groundwater and soil contamination related to the various naval refurbishing activities sited there. While various subsections of this workplan are acceptable, there are some specific issues enumerated below that need to be addressed in the Draft/Draft Final version.

In this Document the database has searched for constituents present in groundwater which have a Primary or Secondary Drinking Water Standard which are also promulgated as groundwater standards. In addition to the Primary and Secondary Drinking Water standards the Department has a "minimum criteria" rule in Chapter 17-520, F.A.C.. In accordance with our "minimum criteria" rule, there are other chemicals of concern that must be identified and adequately addressed. We need to discuss this issue further and determine how to resolve this matter without impeding upcoming work.

## **SPECIFIC COMMENTS**

Section 1.1.2.1 Risk Screening.- This subsection, part of the Introduction, should be more specific. While decisions regarding initial responses are indicated to be determined based on "the level of risk and its relationship to the risk threshold", the author does not discuss what will constitute an acceptable risk level. The section should include a brief discussion of what will be unacceptable human health risks and as stated in the document leave detailed discussions of risk assessment for the forthcoming Risk Assessment section.

Page 2-22.- Discuss recovery efforts to date of free product at well NARF-2.

Page 2-32.- Please indicate where the Navy plans a discussion of the results of the field data when compared to the offsite laboratory confirmatory analysis. It would be prudent to include in this workplan a table of the detection limits achieved in the field GC.

Section 2.3-5 Preliminary Chemicals of Concern (COC) and Appendix K-1.- The Appendix is confusing. Does a -1.00 (ppm or ppb) indicate that the COC was searched by the database at that level or simply that not enough information is available?. Also, explain the Group column.

Section 2.3-5 Preliminary Chemicals of Concern (COC) and Appendix K-1.- The Navy has created a composite database of all environmental data generated to date at OU-3 and compared it to current ARARs. The results of this comparison are listed in Table 2-9 where all the preliminary COC at OU-3 are listed. A subsequent review of Appendix K-1 shows that the database has not been compared to all the ARARs currently available. For instance, Endrin, which has a Florida Primary Drinking Water Standard of 0.2 ug/l, has been searched for in the database at ten times our standard. Naphthalene has been checked at the 17-770 level of 100 ug/l but not against the organoleptic value of 10 ug/l that will need to be used in the Base Line Risk Assessment. Likewise, Chromium has been checked at twice the State of Florida's Primary Drinking Water Standard. Since more data points and locations of concern could be obtained, the Navy is encouraged to review all the ARARs used in the database.

Table 2-9.- Explain the "A" qualification for Arsenic.

Appendices A to J.- The information presented is adequate for its purposes.