



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

NAS Jacksonville Administrative Record
Document Index Number
32212.003
05.01.03.0007

Colleen M. Castille
Secretary

April 13, 2004

Mr. Matt Allen, ES31
NAVFAC EFD SOUTH
P.O. Box 190010
North Charleston, SC 29419-9010

file:51PSC_ROD1.doc

RE: Record of Decision for Potential Source of Contamination 51: Oil Disposal Area and Fire Fighting Training Area, Revision 1, Naval Air Station Jacksonville; Jacksonville, Florida

Dear Mr. Allen:

I have reviewed the above document dated November 2003 (received November 25, 2003). The initial document was previously reviewed by Jorge Caspary, who had no comments and Pete Dao of EPA Region IV, who furnished 32 comments. Because of the large number of comments, I have done a close review, bearing in mind that my predecessor had few comments. My comments are, however, more philosophical in nature than the usual regulatory "pickey" types of concerns. This sometimes leads the respondent to not take them as serious as if I posed a long question sprinkled with CTLs and legal terms. They are serious, however, and should be adequately addressed.

In all my reviews, my concerns are simple, really: have all contaminants, in all media, been delineated both vertically and laterally to a degree that will enable proper cleanup and/or site management? My preference is data presentation on figures or maps that enable the reviewer to quickly check my concerns. I note specifically that a figure showing data collection points and accompanying tables (or worse, laboratory analyses sheets in an appendix) are not the same as visual data presentation. As a regulator, my job is to check (and hopefully concur) with the facility's interpretation of the data, otherwise, how do you know that the data are adequate? My job is not to plot and interpret data. For sites that will undergo active remediation, I am sometimes more liberal at this point, knowing that more data will be obtained during remediation. Where active remediation is not anticipated and Land Use Controls (LUCs) or Monitoring for Natural Attenuation (MNA) is contemplated, I am more stringent in my data needs. For instance, if I don't know the full extent and magnitude of the contaminants, how will I know when MNA has achieved the cleanup goals or if the LUC boundaries are protective?

With those thoughts in mind, following are my concerns for this document. All comments should be adequately addressed before the document can be considered acceptable.

1. Based on the name of the site, the Oil Disposal Area and Fire Fighting Training Area, I find it curious that there are no semivolatile petroleum constituents in the soil. Please confirm that those materials were adequately assessed and/or remediated. Additionally, please justify the reason for the statement on page 2-1 that (regarding the stated soil contaminants) the contamination "is assumed to extend to 1 foot below land surface." Were data obtained below 1 foot BLS? If not, please justify why not. If I am to agree to LUCs, I must know the extent of contamination. If the lateral extent of contamination is adequately known, we must decide on the shape of the LUC areas.
2. Were the areas that were excavated adequately assessed so that we know that soil contamination does not remain in the bottom of the excavated areas? Please provide an explanation sufficient for this document.
3. On page 2-8, it states that the July 2002 field event occurred because of hexavalent chromium that exceeded industrial SCTLs. I cannot discern the location or amount of that particular material and Figure 2-6, Table 2-1 and 2-2 provides no information (as I have previously stated, above, such data presentations are marginal at best. Please discuss the hexavalent chromium: the data points, magnitude and the disposition. Does hexavalent chromium exist on the site in excess of Industrial SCTLs? Please provide lateral extent information for that material.
4. Please justify why Soil Alternative 2 is protective given that contaminants exceed industrial SCTLs and no provision for a cap or cover is made. If contamination remains above Industrial SCTLs, this alternative is not protective. In addition, I find little value in discussing "natural transformation" or "degradation" of inorganic contaminants, since they do NOT do that. At the least, removal of those contaminants to meet Industrial SCTLs or an approved 95% UCL examination should be considered. Don't forget, however, the contamination is likely deeper than the previously "assumed" 1 foot BLS. I may agree to implement LUCs under the umbrella of "hazard mitigation," but removing them will entail information that is apparently not available at this time, but will eventually be required.
5. On page 2-64, I'm not sure you can "instruct" the St. Johns River Water Management District regarding permits. It's Navy property; it seems like a Navy issue to me.

Thank you for the opportunity to review this document. I look forward to discussing these comments with you in detail.

Sincerely,



James H. Cason, P.G.
Remedial Project Manager

Mr. Matt Allen
April 15, 2004
Page Three

CC: Greg Roof, TTNUS, Jacksonville
Pete Dao, EPA Region IV, Atlanta
Jane Beason, NASJAX

ESN ~~ESN~~ JJC 