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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING RESOURCE
CONSERVATION AND RECOVERY ACT FACILITY ASSESSMENT/SAMPLING VISIT WORK
PLAN FOR GROUP 2 SOLID WASTE MANAGEMENT UNITS NS MAYPORT FL
8/10/1993
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

NAVSTA Mayport Administrative Record
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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Capt. R. T. Ziemer
Commanding Officer
Naval Station Mayport
Mayport, Florida 32228-0112

RE: RCRA Facility Assessment/Sampling Visit Work Plan for Group
II SWMUs at Naval Station Mayport, Florida
FL9 170 024 260

Dear Capt. Ziemer:

The United States Environmental Protection Agency (EPA) has reviewed the RCRA Facility Assessment/Sampling Visit (RFA/SV) Work Plan for Group II SWMUs at Naval Station Mayport, Florida. The subject document complies with the Hazardous and Solid Waste Amendments (HSWA) Permit, RCRA Facility Assessment (RFA) Guidance, and the approved RCRA Facility Investigation (RFI) Work Plan. Minor comments are enclosed. EPA approves the subject Work Plan contingent upon consideration of the attached comments.

The Final RFI Work Plan for Group II SWMUs for Naval Station Mayport must be submitted to this office no later than October 1, 1993, to:

Mr. Joseph R. Franzmathes
Director
Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30365

ATTN: Federal Facilities Branch

Failure to comply with any condition of your RCRA permit may result in sanction pursuant to Section 3008(a) of the RCRA 42 U.S.C. 6928, as amended by the Federal Facilities Compliance Act of 1992, under which EPA may seek the imposition of penalties of up to \$25,000 for each day of continued non-compliance.

If you have any questions, please contact Doyle T. Brittain of the Federal Facilities Branch, Department of Defense Remedial Section, at (404) 347-3016. For questions regarding compliance and enforcement, please contact Ken Lapiere of the RCRA Compliance Section at (404) 347-3016.

Sincerely,



Joseph R. Franzmathes
Director
Waste Management Division

Enclosure

cc: James G. Reed, Jr., SOUTHDIVFACENCOM
Eric Nuzie, FDER
Arthur G. Linton, EPA

EPA'S COMMENTS ON THE
RCRA FACILITY ASSESSMENT/SAMPLING VISIT WORK PLAN
FOR GROUP II SOLID WASTE MANAGEMENT UNITS
AT NAVAL STATION, MAYPORT, FLORIDA

The RCRA Facility Assessment/ Sampling Visit (RFA/SV) Work Plan is a well written report that presents the history of each of the Solid Waste Management Units (SWMUs) under investigation as part of the RFA process for the Group II SWMUs, as defined in the Corrective Action Management Plan (CAMP). The Work Plan also presents the locations and rationale for the proposed sampling at each SWMU and proposes a logical sampling program for the identification of releases or potential releases in the media most likely to have been affected by a release from each SWMU. The Work Plan is consistent with the RFA Guidance, the RCRA Facility Work Investigation (RFI) Work Plan, and the Hazardous and Solid Waste Amendments (HSWA) Permit for Naval Station Mayport with minor exceptions noted below.

1. The addition of background and/or control samples for all SWMUs is recommended to allow an accurate evaluation of the analytical results from the sampled media at each SWMU. Without the background/control analytical data, it will not be possible to evaluate the release of inorganic compounds (metals) to environmental media at each of the SWMUs.
2. Page 3-5, Paragraph 2: Based on the size of the waste pile of Black Beauty slag and the time period covered by the waste in the pile, it is recommended that at least three samples of the waste slag be collected and analyzed for Toxicity Characteristic Leaching Procedure (TCLP) analytes. The one sample proposed is insufficient to provide representative analysis of the waste at this SWMU.
3. Page 3-5, Paragraph 5: Based on the size of SWMU 28, the proposed collection of six randomly located surface soil samples may be insufficient to provide an accurate evaluation of the potential of release from the solid waste stored at this SWMU. A visual reconnaissance prior to defining sampling locations is recommended to locate areas of stressed vegetation and/or discolored soils adjacent to the asphalt pavement. The purpose of the RFA is to identify releases or potential releases from a SWMU. The proposed random soil sampling may not accomplish this objective of the RFA.
4. Page 3-7, Paragraph 5 and Table 3-3: The text in the noted paragraph states that groundwater samples will be collected from the two monitoring wells adjacent to SWMU 48. However, no mention of these samples is included on Table 3-3, "Summary of the Samples to be Collected at SWMU 48 ---". Please correct Table 3-3 to be consistent with the text.