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NS MAYPORT
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LETTER REGARDING NOTICE OF TECHNICAL INADEQUACY OF DRAFT PHASE 1
RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION REPORT
GROUP 1 SITES VOLUMES 1 AND 2 NS MAYPORT FL
8/26/1992
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

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

NAVSTA Mayport Administrative Record
Document Index Number

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AUG 26 1992

4WD-RCRA & FFB

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Captain D. Van Saun
Commanding Officer
U.S. Naval Station, Mayport
P.O. Box 280112
Mayport, Florida 32228-0112

RE: Notice of Technical Inadequacy
RCRA Facility Investigation Report - Group 1 Sites
Naval Station Mayport, Mayport FL
EPA I.D. No. FL9 170 024 260

Dear Captain Van Saun:

The Environmental Protection Agency (EPA), Region IV, has received and reviewed the following documents all dated July 1992:

Draft RCRA Facility Investigation, Phase I, Volume I of II, U.S. Naval Station Mayport, Florida

Draft RCRA Facility Investigation, Phase I, Volume II of II, Appendices A, B, C, D, and E, U.S. Naval Station Mayport, Florida

These submittals fail to satisfy Condition II.F.2. RFI Report of U.S.N. Station Mayport's Hazardous and Solid Waste Amendments portion of the Resource Conservation and Recovery Act Permit. EPA comments are enclosed. These comments must be addressed and approved before this document can be accepted as final.

The corrected RFI Report for the Group I solid waste management units (SWMU's) is due to EPA 30 days from the receipt of this letter. Note that until the report is approved, you have not fulfilled the requirements for permit condition II.F.2. RFI Report of the Hazardous and Solid Waste RCRA permit effective March 25, 1988.

Failure to meet the deadline for the submission of the revised Group I RFI Report may result in sanctions pursuant to §3008 of RCRA, 42 U.S.C. 6928, consistent with Executive Order 12088, Federal Compliance with Pollution Control Standards. If further time is required for the submission of the revised Group I RFI Report, then specific justification must be presented (II.G.7. Schedules of Compliance).

If you have any questions, please contact Mr. James W. Hudson, of my Federal Facilities Branch staff, at (404) 347-3016.

Sincerely yours,

James S. Kutzman for

Joseph R. Franzmathes
Director
Waste Management Division

Enclosure

cc: Satish Kastury, FDER
Eric Nuzie, FDER
James Malone, Jr., SODIVNAVFACENGCOM
Jim Reed, SODIVNAVFACENGCOM

EPA Region IV comments for the following documents, dated July 1992:

Resource Conservation and Recovery Act (RCRA) Facility Investigation, Phase 1, Volume I of II, U.S. Naval Station Mayport, Florida.

Resource Conservation and Recovery Act (RCRA) Facility Investigation, Phase 1, Volume II of II, Appendices A,B,C,D and E, U.S. Naval Station Mayport, Florida.

Comments

1) According to Naval Station Mayport's HSWA Permit, the RFI Report (condition II.F.2.) "shall include an analysis and summary of all required investigations of solid waste management units (SWMU's) and their results". EPA Region IV concurs with the Navy's decision to investigate these SWMU's collectively as an operable unit. Additionally, EPA recognizes the effectiveness, efficiency and cost savings associated with an operable unit investigation. However, for the purposes of USN Mayport's HSWA Permit, each SWMU within the operable unit must be investigated and reported individually.

The RCRA Facility Investigation Workplan, approved by EPA, was to investigate what the Navy identified as Group I SWMU's. These SWMU's included Landfill B, Landfill D, Landfill E, Landfill F, the Old Fire Fighting Training area and Building 1600 Blasting area. Insufficient detail was provided both in the figures and text to determine what investigative work was performed for each SWMU. The figures provided in the report cover the entire facility making the locations of soil samples, ground water wells and other aspects of this investigation too difficult to determine. Each SWMU covered in this investigation should have a figure showing what existed at the SWMU, what investigative work has been performed in the past (monitor wells, etc.) and what was performed at the SWMU as a result of this investigation (soil and surface water sample locations, monitor well locations, etc.). Figures should also present the magnitude and extent of the contamination that was found as a result of this investigation. Text should present the investigation, findings and defend the Navy's decision for each SWMU.

2) The risk assessment section of this report should include both a baseline and current land use scenario for human and ecological exposure levels for each SWMU. This will occur for each and every Group I SWMU.

3) Corrective action decisions and HSWA Permit modifications are made on a SWMU by SWMU basis. The Navy's corrective action decision presented in this report is based on the Group I concept rather than as individual SWMU's. This decision, as presented in this report, is not acceptable to EPA.

4) The risk assessment section of this report shows that risk levels are unacceptable for certain SWMU's. These SWMU's will require some sort of corrective action or interim measure. That information could, in general terms, be presented in this report.

5) As part of the Group I RCRA Facility Investigation (condition II.F.2.), the report shall also describe the extent of contamination (qualitative/quantitative) in relation to background levels indicative for the area. Are the background samples obtained in this RCRA Facility Investigation representative of conditions found at each SWMU, or are the background samples more representative of the "Station"? Can the Navy defend these numbers in determining corrective action levels and/or interim measures on a SWMU by SWMU basis?

6) According to Sections 6.0 and 7.0 of Volume I, additional investigative work and interim measures will be required for some of the Group I SWMU's, however no corrective measures study is recommended based on the data obtained. EPA concurs with the Navy's decision to investigate further the contaminated media associated with those SWMU's. Additionally, EPA concurs with the Navy's proposal to undertake interim measures at several SWMU's. The Navy must provide EPA with work plans that must be approved before any interim measures can start (condition II.D. Interim Measures). However, EPA does not concur with the Navy's position regarding corrective action(s). Individual SWMU's will need to be reevaluated. Based on a SWMU by SWMU review the HSWA Permit will be modified to incorporate whatever decision is reached, i.e., no further action, and/or corrective action.

7) The Group I SWMU's requiring further investigation and interim measures must be reflected in U.S.N. Mayport's corrective action management plan (CAMP) schedule. The amended CAMP schedule will be required following the final approval of this document.

(end of comments)