

N60201.AR.002559
NS MAYPORT
5090.3a

LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON RCRA FACILITY
INVESTIGATION WORK PLAN SUPPLEMENTAL SAMPLING PLAN ADDENDUM 5 GROUP 3
SOLID WASTE MANAGEMENT UNITS NS MAYPORT FL

7/19/1994
U S EPA REGION IV

I

9421-2504



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

AUG 19 1994

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDCommanding Officer
c/o Michael Davenport
U.S. Naval Station Mayport
P.O. Box 265
Mayport, Florida 32228SUBJ: Technical Review Comments for the RCRA Facility
Investigation Work Plan Supplemental Sampling Plan,
Addendum 5, Group III Solid Waste Management Units
Naval Station Mayport, Jacksonville, Florida

Dear Mr. Davenport:

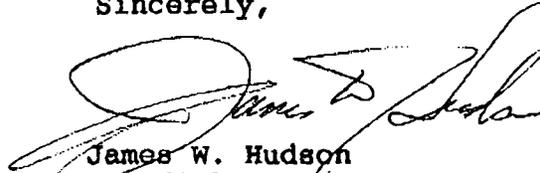
The U.S. Environmental Protection Agency (EPA), has received and reviewed the Draft Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Work Plan, Supplemental Sampling Plan, Addendum 5 - Group III Solid Waste Management Units (SWMUs) at Naval Station Mayport (Mayport). EPA's comments are enclosed. EPA will accept errata sheets to be substituted for pages requiring the necessary new information. Please include an index with the errata sheets which pages are to be substituted. These errata pages are due to EPA by August 23, 1994.

Please note that this letter should be deemed as an unofficial Notice of Technical Inadequacy (NOTI) and that EPA is using this approach in order to expedite approval of documents and to limit the number of official NOTI's your facility receives from EPA.

2

Should you have any questions regarding these comments,
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 Muzie, FDEP
David Driggers, SOUTHDIVNAVFACENGCOM

Comments

1. Page 1-13, Figure 1-6: Provide an explanation for the question marks shown between the different strata.
2. Page 1-14, Figure 1-7: See Comment No. 1.
3. Page 1-16, Figure 1-9: See Comment No. 1.
4. Page 1-17, Figure 1-10: See Comment No. 1.
5. Page 1-18, Paragraph 3: The text refers to the general direction of surficial groundwater flow as being toward major surface water features. However, maps should be provided which show groundwater elevation contours and specific groundwater flow direction.
6. Page 2-1, Paragraph 2: The text states that SWMUs 1, 14, 17 and 12 were identified for further study during the Initial Assessment Study in 1985. SWMUs 1 and 14 were included in the Expanded Site Investigation in 1987; during the RFA in 1989, SWMUs 1, 14 and 17 were identified as requiring a RFI. The text should explain why SWMU 12 was omitted from further investigation.
7. Page 2-2, Paragraph 2: The text states that during the RFA in 1989, 15 SWMUs were determined to require no further action, 18 were determined to require an RFI, and 23 were determined to require confirmatory sampling through an RFA. The text should state the rationale for these conclusions, particularly those affecting the Group III SWMUs.
8. Page 2-3, Paragraph 2: The background samples listed in tables 2-1 through 2-4 should be shown on a location map for clarification and adequate evaluation.
9. Page 3-5, Figure 3-2: Any SWMUs should be identified on this figure.
10. Page 3-7, Figure 3-3: See Comment No. 9.
11. Pages 3-17, Paragraph 3: The text states that a Special-Purpose Investigation was conducted in the vicinity of the JSI Administration Building, during which two surface soil samples were collected and analyzed for a "selected subset of 40 Code of Federal Regulations, Part 264, Appendix IX Groundwater Monitoring List parameters." Since the purpose of this investigation, as stated in the Draft RFI Work Plan was to "assess whether contamination of soils may present a long-term health threat to the NAVSTA Mayport employees," the complete Appendix IX parameters should be analyzed instead of a subset in order to fully characterize the nature of contamination.
12. Page 3-20, Table 3-2: In notes at the bottom of Table 3-2,

the text states that "all analytes were collected from 3 to 4 foot depths." The term "analytes" should be replaced with "samples." In addition, it should be clarified if the samples were collected from 3 to 4 feet below ground surface.

13. Page 3-21, Figure 3-10: See Comment No. 9.
14. Page 3-23, Paragraph 1: In reference to the analytical results from a sampling event which followed the Special-Purpose Investigation, the text states that "the highest concentrations of lead and mercury were isolated occurrences." This statement is somewhat misleading. The detection of mercury at 525 milligrams per kilogram does appear to be an isolated occurrence; however, from the analytical results shown in tables 3-1 and 3-3, lead contamination is prevalent in the northern half of the parking area in SWMU 2.