



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 6, 2007

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Mr. Anthony Robinson
Department of the Navy
Naval Facilities Engineering Command Southeast
2155 Eagle Drive, PO Box 190010
North Charleston, South Carolina 29419-9010

Dear Mr. Robinson:

I have reviewed the Draft Final Remedial Investigation/Feasibility Study Report, Revision 1, Operable Unit 8, PSC 47, Naval Air Station Jacksonville, dated May 2007 (received May 24, 2007). I have the following comments on the report:

- (1) On page 3-2, Section 3.3, third paragraph, first bullet, it says that the groundwater flow direction was determined in the RFI to be northeasterly. All the figures showing groundwater flow direction in Chapter 2 show groundwater flowing to the northwest. Please verify the flow direction in the RFI.
- (2) On page 3-3, Section 3.3, last bullet, it says that the human health risks were acceptable based on USEPA standards (less than 1E-04). The specific human health risk should be identified as risk of cancer. Also, it should state that carcinogenic human health risks were not acceptable based on FDEP criteria (greater than 1E-06).
- (3) On page 4-8, Section 4.2.1.3.1, second to last line of the section, the deep groundwater sample should be identified as being from 32 to 36 ft bls.
- (4) I could not reconcile the Phase I and II soil sampling discussions in Sections 4.2.1.1, 4.2.2.1 and 5.3.1 with the Figure 4-2. Figure 4-2 indicates most surface soil samples were collected from 0 to 1 ft bls, while the text indicates that most surface soil samples were collect from 0 to 6 inches bls.
- (5) On page 5-3, Section 5.3.1.1, beginning of first sentence, I believe it should read "Fifty-nine (59) surface soil samples . . ." Also, it says that surface samples were collected from 0-2 ft bls, which contradicts what is said in Section 5.3.1 and 4.2.1.1.

- (6) On page 5-4, in Section 5.3.1.1.1, second paragraph, arsenic and benzo(a)pyrene equivalents are discussed as being pesticides.
- (7) Why a deep, saturated soil sample (SB32) was collected from a depth of 47 to 48 ft bls and that sample analyzed for organophosphate pesticides should be explained.
- (8) On page 7-5, second paragraph, it says that surface soil is defined as soil collected from 0 to 1 ft bls and subsurface soil is defined as soil collected from depths greater than 1 ft bls. FDEP defines surface soil as soil collected between 0 and 2 ft bls and subsurface soil as soil collected from depths greater than 2 ft bls.
- (9) On page 7-33, second paragraph, it says that the average concentration in groundwater was used as the EPC for evaluating exposures to groundwater. FDEP does not allow for the averaging of groundwater concentrations to determine exposure point concentrations.
- (10) On page 7-74, Table 7-22, top of the table where it calculates Remedial Goal Options for Soil for the Occupation Worker, FDEP's industrial/commercial SCTLs should be used in that table.
- (11) On page 7-76, Table 7-23, in the part of the table for the Adult Resident, the FDEP GCTL for dieldrin is incorrectly written as .005 µg/L where on the same page it is correctly written as .002 µg/L.
- (12) Please determine whether COCs or COPCs are being discussed on pages 7-77 and 7-78.
- (13) In Tables 9-2 and 9-4 that list the state ARARs and TBCs, the following should be added:
 - (a) FAC Chapter 62-730, Florida Hazardous Waste Rules
 - (b) FAC Chapter 62-780, Contaminated Site Cleanup Criteria
 - (c) Guidance for the Selection of Analytical Methods and for the Evaluation of Practical Quantitation Limits
 - (d) Section 376.30701, Florida Statutes, Pollutant Discharge Prevention and Removal
- (14) On pages 9-10 and 9-11, in the table listing the PRGs for groundwater, the GCTL for dieldrin should be .002 µg/L. Also, pursuant to FAC Rule 62-

780.680(1)(c), groundwater that has contaminant concentrations that do not exceed the less stringent of the risk-based groundwater CTLs in FAC Chapter 62-777; the background concentrations; or the best achievable detection limits (Practical Quantitation Limits); is not considered contaminated. Therefore, for certain contaminants like aldrin, dieldrin and alpha-BHC, the laboratory Practical Quantitation Limit may be substituted as a PRG for the risk-based GCTL. Some of the other COCs identified in groundwater may also have PQLs above risk-based GCTLs.

- (15) In Table 9-6, please add FAC Chapters 62-777, 62-780 and 62-520. Please remove FAC Chapter 62-736 as that rule has been repealed. Signage requirements are now located in FAC Rule 62-730.225(3).
- (16) On page 10-7, Section 10.2.2.1, in the discussion of Implementability, it says that "Resources are readily available for the preparation of deed restrictions." As this site will remain in Navy ownership, deed restrictions are not the appropriate mechanism for implementing land use controls. Rather, land use controls at operating military bases are usually implemented using the Base Master Plan and other administrative controls to keep prohibited activities from occurring on sites with land use controls.
- (17) There is something missing from the discussion on page 10-8 and 10-9 on capping. A cap used for an impervious cover system would require periodic certification by a Professional Engineer that it remained impermeable. However, a cap only used to prevent direct contact with contaminated soil beneath the cap may only require a visual inspection to determine that it still remained.
- (18) On page 10-15, top paragraph, the discussion on the determination of whether excavated soil would require disposal as RCRA-hazardous is flawed. Only if concentrations of contaminants of "listed RCRA waste" exceed FDEP industrial SCTLs or the soil is determined to be characteristically hazardous should the excavated soil be managed and disposed as RCRA-hazardous.
- (19) In the Section 10.5.2.1 on Land Use Controls, the Risk-Based Correction Action ~~Risk Management Options of FAC Chapter 62-780 are described.~~ Please note that previous discussion with EPA regarding the use of only permanent groundwater restrictions to manage groundwater contamination with concentrations above federal MCLs has not been allowed.

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- (20) On page 11-9, Section 11.2.2.1, Component 2, third bullet, see comment (18) above.

If you have any concerns regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager

CC: Tim Bahr, FDEP
Peter Dao, USEPA Region 4, Atlanta
Bill Raspet, NASJAX, Jacksonville
Mark Peterson, Tetra Tech, Jacksonville

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