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September 12, 2008

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

**TETRA TECH NUS, INC.
JACKSONVILLE, FL**

RE: Draft Record of Decision for Operable Unit 8, Potential Source of Contamination 47, Naval Air Station Jacksonville, Jacksonville, Florida.

Dear Mrs. Wilson:

I have reviewed the Draft Record of Decision for Operable Unit 8, Potential Source of Contamination 47, Naval Air Station Jacksonville, dated August 2008 (received August 6, 2008), prepared and submitted by Tetra Tech NUS, Inc. I have the following comments on the document:

- (1) On page 1-2, Section 1.3, last sentence, it says that if the response action selected in the ROD is not implemented, soil and groundwater contaminants may present an imminent and substantial endangerment to public health, welfare or the environment. As the already conducted RBCA interim action would have addressed risks to current site workers and as groundwater is not used at the site, the imminent and substantial endangerment language seems too strong.
- (2) On page 1-3, first sentence on top of page, it says that the COCs in groundwater are typically conducive to reduction via natural processes. Pesticide and arsenic contamination is not typically conducive to reduction via natural processes.
- (3) On page 1-3, second paragraph and following bullets, no mention is made of the land use control that will prohibit use of the site for residential, residential-like, agricultural or recreational use.
- (4) On page 1-4, Section 1.5, the LUCs are incorrect. They have been taken from the Site 15, Naval Air Station Cecil Field, Record of Decision and include prohibitions on commercial/industrial and medium and high-intensity recreational uses.

- (5) On page 2-5, Section 2.2.2, there are a list of documents and activities associated with PSC 47. Please ensure that those documents and the documents associated with those activities are part of the Administrative Record. Also, please add the documents associated with the latest interim action conducted at the site.
- (6) On page 2-8, Section 2.5.3.1, much of the section should be changed from the present tense to the past tense to reflect that interim actions have occurred.
- (7) On page 2-9, top of page, please remove (Lindane) as it is only one of the hexachlorocyclohexane isomers, specifically gamma-.
- (8) On page 2-9, second paragraph, please identify which SCTLs were exceeded in the drainage swale, whether residential, commercial/ industrial or leachability.
- (9) Section 2.5.3 needs a section discussing the interim action recently conducted. This section needs to describe the risk-based corrective action process, how cleanup numbers were developed to address apportionment, the 95% UCL calculations, etc.
- (10) On page 2-16, third paragraph, it does not say what chemical or chemicals were detected above GCTLs in the deeper portion of the shallow aquifer. It also says that the exceedance was very close to the GCTL value. This is not very clear. By very close, is it fractionally greater or is it within an order of magnitude.
- (11) On page 2-19, first paragraph, last sentence, it says there have been no detections of arsenic in the shallow or deep monitoring wells downgradient of the arsenic exceedances. This is not accurate as arsenic has been detected in shallow and deep wells in other areas of the site, just not above its GCTL.
- (12) Page 2-21, first paragraph, second sentence, please change it to read the "Any other use (e.g., residential or recreational land use) will require a reevaluation of the risks from residual contamination remaining at the site and would potentially require additional site assessment and/or remedial action.
- (13) In Section 2.6.1, Summary of Human Health Risk Assessment, please add an explanation of DEP's requirement to apportion risk as well as the 95% UCL calculation to determine exposure point concentrations. A table should be added showing the Department's default SCTLs, the alternative SCTLs that were calculated due to apportionment and the 95% UCL exposure point concentration (virtual) calculated for risks after the interim action was completed. Please note

that this table should replace the table at the top of page 2-28 which mistakenly has the cleanup goals for PSC 47 as being the Department's residential SCTLs.

- (14) On page 2-33, Alternative S3, it should say that areas of the site will be excavated to prevent unacceptable risks to future workers. Please note that the SCTLs that were identified as cleanup goals in the risk-based corrective action were based on apportioned SCTLs, not the Department's default industrial SCTLs.
- (15) Please note that the LUC language is not consistent throughout the document. In some places the language states that only commercial/industrial activities will be allowed, in other places that language states that residential and agricultural reuse will be prohibited.
- (16) On page 2-31, top of page, second and third bullets, the explanation of how characterization of excavated soils to determine whether they are RCRA hazardous or non-hazardous is not accurate. I would remove part of the explanation and simply state that soil characterized as RCRA hazardous waste was sent off-site to a facility permitted to accept RCRA hazardous waste and that soil characterized as RCRA non-hazardous was sent for disposal at a RCRA Subtitle D solid waste landfill. Please also put in the actual amount of soil disposed in either manner and mention that Land Disposal Restrictions were complied with for the RCRA hazardous waste soil.
- (17) I noticed that in Table 2-4 and 2-5, only state regulations were identified as ARARs and that ARARs regarding hazardous waste characterization and disposal were not identified. Please make a concerted effort to identify the federal ARARs for the cleanup of this site, including the RCRA rules regarding the handling of hazardous waste (Land Disposal Restrictions).
- (18) State ARARs regarding the risk-based corrective action conducted recently pursuant to Chapter 62-780, Florida Administrative Code, are needed in Table 2-5. These ARARs will need to encompass the Department's rules regarding the calculation of apportioned SCTLs, the 95% UCL exposure point concentration calculation, the 3X "hot spot" rule and the Department's rule regarding cleanup of contaminants to prevent carcinogenic risks greater than 1×10^{-6} . I will make myself available to the Navy and EPA in determining which parts of Chapter 62-780, F.A.C., should be listed as ARARs as well as other rules and regulations that should be either ARARs or TBCs.

Mrs. Adrienne Wilson
Record of Decision for PSC 47
September 12, 2008
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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
Tim Curtain, NASJAX, Jacksonville
Mark Peterson, Tetra Tech, Jacksonville
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for
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