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NAS JACKSONVILLE
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON THE DRAFT FINAL
FIVE YEAR REVIEW FOR OPERABLE UNITS 1, 2, 3, 4, 5, 6, 7 AND 8 NAS JACKSONVILLE
FL (PUBLIC DOCUMENT)

3/21/2011

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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Secretary

March 21, 2011

Commanding Officer
NAVFAC Southeast
Attn: Adrienne Wilson
Code OPA6, Cube 36
Building 135
NAS Jacksonville, FL 32212-0030

RE: Draft-Final Five-Year Review, Operable Units 1, 2, 3, 4, 5, 6, 7, and 8, Naval Air Station Jacksonville, Jacksonville, Florida

Dear Adrienne:

The Department has reviewed the Draft-Final Five-Year Review, Operable Units 1, 2, 3, 4, 5, 6, 7, and 8, Naval Air Station Jacksonville, dated February 2011 (received February 28, 2011), prepared by Tetra Tech NUS, Inc. Review of the Operable Unit 2 section was conducted by the Department's Hazardous Waste Regulation Section. The Department has the following comments:

- (1) On page iv, for OU 3, issue #5, the second sentence has a double negative where it says "... but it is not anticipated that ARARs have not been achieved ..."
Please clean up this sentence.
- (2) On page 1-9, Section 1.2.7.2, second to last sentence, it says that groundwater in the Floridan aquifer in the vicinity of NAS Jacksonville is moving eastward toward areas of heavy pumping (Fairchild, 1977). Please verify that is current and correct as Jacksonville has been developed quite a bit since 1977.
- (3) On page 2-10, in the section on Groundwater, first paragraph, third sentence, it mentions obtaining a legal restriction on use of groundwater for consumption. Please identify what "legal" means in that context.

- (4) On page 2-19, Section 2.5.2.5, first paragraph, second to last sentence, please verify that 1×10^{-6} cancer risk is the maximum value EPA has determined to be acceptable for indoor vapor intrusion.
- (5) On page 3-7, Section 3.2.2, first paragraph, because PSC 42 contains waste in place, "cleanup" will not occur unless a later decision is made to remove the waste disposed on site. Under current RCRA regulations, monitoring will continue indefinitely under the Post-Closure Care Period. Initially, a Post-Closure Care Period is set for 30 years (40 CFR Part 264.117(a)(1)). However, the Post-Closure Care Period can be extended or shortened (40 CFR Part 264.117(b)). Therefore, the Navy should not be under the impression that if groundwater eventually attains the Department's groundwater cleanup target levels, that additional groundwater monitoring would not be required.
- (6) On page 3-15, Section 3.4.3, second paragraph, as the regulations currently operate, if the Compliance Monitoring Program under 40 CFR 264.99 is no longer necessary, groundwater monitoring would return to a Detection Monitoring Program under 40 CFR 264.97 because wastes have been left in place.
- (7) On page 4-9, Section 4.2.2, last paragraph, it says that the St. Johns River is used for commercial and recreational purposes by adults and adolescents. This description of the uses of the river would be better served by identifying the Class of the river and what that Class conveys. I find that the terms commercial and recreational, while accurate, convey that the risk assessment inputs for those receptors are not transferable to a surface water body like the St. Johns River.
- (8) On page 4-13, first sentence on top of the page, please exchange the words "remedies" and "IRAs".
- (9) On page 4-25, last sentence, please remove the second "that" in the sentence.
- (10) On page 4-40, recommendation #7, it says low levels of contamination less than 100 parts per billion exist across most of OU 3. However, it does not mention which contaminant or class of contaminant is being described.
- (11) On page 4-42, second to last sentence on the bottom of the page, it says that "These dredged sediments were organic rich and the clay layer was absent in this area." This is not correct. The dredging removed the clay layer and the surrounding St. Johns River sediments that quickly filled the dredged area were organic rich.

- (12) On page 4-44, third bullet, second sentence, it describes “. . . shallow contamination of a similar nature is present.” Similar to what?
- (13) On page 6-9, Section 6.4.3, the heading for the section should be for OU 5, not OU 1.
- (14) In Section 6.7.2, where it describes changes in standards and TBC criteria, please note that there has been a change to the naphthalene GCTL from the value listed in Table 6-2 to 14 µg/L. Also, several chemicals now have surface water cleanup target levels that may not have been promulgated at the time the OU 5 Proposed Plan and Record of Decision were being issued.
- (15) On page 7-9, Section 7.4.3, it mistakenly discusses the costs associated with the remedy at OU 7, while Section 7 is devoted to OU 6.

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

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Tim Bahr, FDEP
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