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NAS JACKSONVILLE  
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON REMEDIAL  
INVESTIGATION FOR OPERABLE UNIT 3 (OU 3) NAS JACKSONVILLE FL  
7/8/1999  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



I [redacted] -2562  
0022

# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

July 8, 1999

Mr. Dana Gaskins  
Code 1857  
SOUTHDIV  
2155 Eagle Drive  
North Charleston, South Carolina 29406

RE: Remedial Investigation For Operable Unit 3. NAS  
Jacksonville, Florida

Dear Mr. Gaskins:

I have completed the review of the above referenced document dated May 1999 (received June 9, 1999). In general, the report is well written and brings together the numerous discussions and agreements our team has had regarding OU-3; however, the following comments need to be addressed before we can consider approval of the report.

### General Comment

1. In accordance with applicable Florida statutes, the report must be signed and sealed by a registered engineer or geologist with primary responsibility for geological interpretations and engineering calculations.

### Specific Comments

2. Page 4-4, Building 780: please indicate if post excavation soil samples were taken. Also, indicate the quantity of soil removed and whether leachability samples were obtained. Also, show in a figure the approximate extent of excavation. If this information is unavailable, refer to a report documenting the referenced IRA.
3. Page 4-19, Interpretation of Soil data: the text indicates that soil samples at Areas A, D, PSC 12 and 14 do not indicate soil contamination. Please indicate what criteria i.e., background, FDEP soil criteria, etc. is being utilized as comparison to assert the lack of soil contamination at these areas.

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

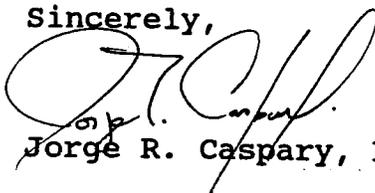
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4. Page 4-19, Inorganics: the text describes *background* and *reference* samples. Is the text describing the same samples?
5. Page 4-35, Figure 4-7 and others throughout the text: dashed lines should be used where a groundwater plume is inferred.
6. Page 4-35, Figure 4-7 and others throughout the text: please submit a separate table showing screen intervals for the piezometers, etc. used to estimate plume thickness. Also, the minimum value used to define the horizontal extent of the plume is 100 ug/L. It would help the reviewer to show that for instance, PZ 208 had no chlorinated solvent detected (ND) above the guidance concentrations.
7. Page 4-36, Table 4-9: Total plume areas and volumes where a plume extent is inferred (see comment 5 above) should, at a minimum, be qualified as "Estimated".
8. Page 5-13, Summary: The text indicates that "no ongoing sources of contamination above the water table have been identified at OU-3". Please indicate whether this sentence is based on a review of waste management practices at NADEP, whether they don't used chlorinated solvent anymore, or other factual basis to assert this statement.

If I can be of any assistance in this matter, please contact me at 904/488-3935.

Sincerely,



Jorge R. Caspary, P.G.

cc: Tim Curtin, NAS Jacksonville  
Lissa Miller, HLA-Jacksonville  
Doug McCurry, EPA-Atlanta

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