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NAS JACKSONVILLE  
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LETTER REGARDING REGULATORY REQUEST FOR FURTHER CLARIFICATION ON  
FACTS PRESENTED AT THE 27 JULY 1993 MEETING NAS JACKSONVILLE FL  
8/10/1993  
U S EPA REGION IV



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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4WD-FFB AUG 17 1993

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Joel G. Murphy  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
Installation Restoration I Branch  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

Handwritten signature or initials.

RE: Remedial Projects Manager Meeting, July 20-23, 1993

Dear Mr. Murphy:

In reference to your July 27, 1993, letter regarding the subject meeting, I do not disagree with the facts expressed but I am not comfortable with the conclusions that an independent, third party who was not present at the meeting could draw from the manner in which those facts are presented. While I believe in being concise, we need to ensure sufficient information is available to maintain clarity. Therefore, I will elaborate on those facts as I understood them.

The three key themes driving the discussions in your letter were: reduction in funding for 1993 and beyond, lack of information regarding some Potential Sources of Contamination (PSCs), and use of existing information.

- 1.a. We never intended for the Operable Unit (OU) #2 Work Plan to not be fully implemented. Rather, the idea was that with limited resources, we need to make the best use of existing resources to deal with worst sites first. Originally, the Operable Units were identified and the Remedial Investigation/Feasibility Study (RI/FS) Work Plan developed based on funding criteria which are now obsolete. While the Operable Unit identification and RI/FS Workplan are still acceptable, their implementation is not. Thus, we need a new strategy which should be reflected in a new Site Management Plan (SMP). The Environmental Protection Agency (EPA) expects the OU#2 Work Plan to be fully implemented, OU#2 fully investigated, and as appropriate remediated. We agreed that with the limited funding you proposed at the meeting (assuming that it is fully allocated) the best use of the

funds would be to conduct a focused RI/FS specifically for source remediation at PSCs 3 and 42. Remaining funds could be reallocated for other high priority work.

- 1.b. Potential remedies have been identified for each of the PSCs before or early in the RI process. The feasibility of these remedies is studied, i.e., the Feasibility Study (FS), concurrent with and inherent within, the Remedial Investigation (RI). Thus, the RI and FS can not be conducted completely separately and independently of each other. Evaluation of these data results in the identification of one or more remedies, one of which is identified in the Record Of Decision (ROD) and as appropriate implemented in the Remedial Design/Remedial Action (RD/RA).

The term "reverse engineering" could cause a whole host of misconceptions which we do not need to deal with. We agreed to meet after the RI was completed, but it is incumbent upon you to ensure the various potential remedies have been concurrently studied so sufficient FS data are present for us to evaluate at that meeting and so we can propose a viable remedy.

- 1.c. This raises several points requiring clarification:

- 1) The first part of that sentence should read "The parties recommend and support the Navy's RPMs use of funds saved from not performing the full RI/FS at OU#2 at this time ---". This relates to identifying and addressing the worst sites first leaving lower priority sites to be addressed at a later date.
- 2) The remainder of that sentence raises two points:
  - a) Where sites have been identified and confirmatory sampling done to demonstrate the absence of contamination, those sites need to be removed from consideration rather than continuing to be carried throughout the years and documents as excess baggage. The formal process of identifying and removing these sites needs to be followed.
  - b) EPA is concerned that some sites have been tentatively identified about which little or nothing is known. EPA is concerned that some of these sites potentially pose a greater risk to health and the environment than any sites which have already been identified. EPA believes that sufficient information needs to be gathered so work at these sites can be

\* prioritized along with work at the other sites. Every PSC needs to be identified, investigated, and prioritized resulting in one complete Site Management Plan for the entire facility. This is required in the U.S. Naval Air Station's Hazardous and Solid Waste Amendments (HSWA) portion of the Resource Conservation and Recovery Act (RCRA) Permit, effective June 19, 1987, conditions II.B.2. and II.C.

PSC 18 is one example. It is a landfill containing radioactive mixed waste. It is surrounded by a manatee sanctuary, children's playground, park with a fishing pier, and heavily traveled road. It is not fenced and → warning signs have not been posted. Its impact on human health or the environment (including endangered species) is unknown.

- 3) Funds not used for remaining work at OU#2 could be used for these activities.

1.d. The comment for 1.b. above applies here also.

\* A tremendous amount of RI work has already been done at OU#1. While the name FS has not been officially identified or used in relation to OU#1, much of the FS work has already been completed. Potential remedies have been identified and studied as an integral part of the RI. What needs to happen at this point is to officially and formally recognize that the FS is already underway. It is important for you to ensure that sufficient data are being generated to satisfactorily complete the FS. What needs to happen then is for the Navy, Florida Department of Environmental Regulation (FDER), and EPA to meet and review those data so we can ensure sufficient information is available for the ROD and RD/RA.

- 1.e. The Navy needs to award any money necessary to conduct the radiological investigation as a part of the on-going RI/FS. This is another example of the concern EPA has for sites for which little or nothing is known [see 1.c.2)b) above]. EPA is concerned that the results of the January 1993 radiological investigation conducted by the Navy are not already available; EPA encourages the Navy to expedite the results of that investigation and to use that information to focus any remaining work needed. EPA is very concerned that this entire effort has been delayed so long resulting in the hold-up or some key RI/FS activities. Specifically, most other RI/FS data are already available and it is almost time to propose a

✓ viable remedy for the ROD, except for the radioactive wastes. Now RD/RA decisions regarding OU#1 must await the radioactive investigation before the OU#1 RI/FS can be completed. It must be noted that unless the Navy can prove otherwise, EPA considers the radioactive wastes at PSCs 13 and 18 and at OU#1 (as well as other PSCs not yet identified) to be radioactive mixed waste and therefore it must be managed as a RCRA regulated waste.

- 1.f. Again, the clarification needs to be made that the full OU#2 Work Plan is not being implemented at this time leaving some work to be completed at a later date. Funds freed up from the OU#2 effort should be used to develop the RI/FS Work Plan for OU#3 (which includes identifying potential remedies to be studied during the RI/FS). After completion of the RI/FS, a meeting will be held to select a viable remedy for the ROD.

★ Considering the nature of the wastes managed within OU#3, known waste disposal practices, nature of the geology, and potential for impact on health and the environment, EPA considers RI/FS related work at OU#3 a high priority.

- 1.g. Upon completion of the Focused Feasibility Study at OU#1 specifically for source remediation of the free floating product, a meeting will be held to determine any remaining RD/RA work to be performed.

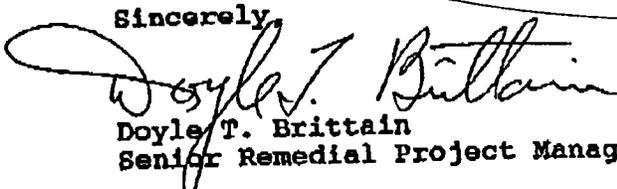
1.h. This fact is correct and clear. However, let me emphasize that EPA expects a Site Management Plan (SMP) which identifies all known work to be performed at (all) PSCs. This includes tasks identified in 1.c.2)a) and b) above.

1.i. This fact is correct and clear.

2. This information is noted.

Please let me know if my understanding of the facts in your letter is different from yours.

Sincerely,

  
Doyle T. Brittain  
Senior Remedial Project Manager

cc: Eric Nuzie, FDER  
Kevin Gartland, NASJAX

Don't have copy!