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LETTER INFORMING THE NAVY OF THE ACCOMPLISHMENTS AT OPERABLE UNIT 2 NAS JACKSONVILLE FL
8/23/1993
U S DEPARTMENT OF THE INTERIOR

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Florida Department of
Environmental Protection

TO: Eric S. Nuzie, Federal Facilities Coordinator
Bureau of Waste Cleanup

THROUGH: Dr. James J. Crane, PG Administrator
Technical Review Section

FROM: Jorge R. Caspary, PG I/Base Coordinator
Technical Review Section

DATE: September 2, 1993

SUBJECT: Review of Scoping Study Field Sampling Plan for Operable Unit 3 (OU-3). NAS Jacksonville.

I have reviewed the subject document and submit these comments for the Navy's consideration.

SPECIFIC COMMENTS

Page 2-9 and 2-10 Geologic Reference Borings (GRBs).- The Navy proposes two GRBs located on an East-West axis. This will provide a limited, two-dimesional view of site lithology and topographical features underlying OU-3. Typically, if GRBs are a required parameter of a geological investigation (shallow or deep), they are oriented on a N-S and E-W axis. By doing so, one axis provides lithological control for the other and can lead to a better estimate of paleo features controling potential contaminant migration pathways as well as lithological components. Based on this, the Department encourages the Navy to consider the installation of two additional Geologic Reference Borings oriented on a N-S axis.

Page 2-12.- The Navy has programmed 24 DPT-CPT borings destined solely to provide scientists and engineers with a detailed model of site stratigraphy. This course of action, supplemented by the drilling of two deep soil borings oriented on an E-W axis (and potentially two more oriented on a N-S axis), is acceptable but it is not the most efficient means of conducting a preliminary scoping study where the levels of constituents present in both media is more important than the knowledge of shallow sedimentary facies present throughout the site. The Department strongly encourages the US Navy to convert some of the CPT borings into paired soundings destined to sample groundwater. This step will lead to a better definition of potential plumes migrating off the industrial area.

Page 2-12.- The spacing (100-200 feet) of the step-out DPT locations may be too large. A more conservative value between 50 to 100 feet is more appropriate given the complex nature of this OU and should be considered by the Navy.

Page 2-15.- The range at which groundwater samples will be obtained (within 4 feet of the water table) is acceptable for screening purposes only and any hits above Federal and Florida's MCLs should be confirmed with the installation of permanent monitoring wells.

Table 3-1.- NEESA Level II data, i.e., "screening level data or field laboratory data" is not acceptable for Risk Assessment purposes. If the Navy wishes to use this preliminary data for Risk Assessment purposes, then, it should prepare a more comprehensive QA/QC Plan for its field lab and submit it for regulatory approval.

Page 3-4 and Table 3-3. Provide instrument detection limits for all the constituents to be analyzed. This data is crucial when conducting a groundwater sampling and analysis program with Direct Push Technology (DPT).