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LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON ECOLOGICAL
RISK ASSESSMENT IMPACTS IN REMEDIAL INVESTIGATION FEASIBILITY STUDY WORK
PLAN FOR POTENTIAL SOURCES OF CONTAMINATION 26 AND 27 NAS JACKSONVILLE

FL

11/29/1990

U S EPA REGION IV

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000202-78



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

Date: November 29, 1990

To: Nancy Dean, RPM
South Remedial Superfund Branch

From: Jeri A. Brecken, Aquatic Toxicologist *J. Brecken*
Ground-Water Technical Support Unit

Thru: Rutherford B. Hayes, Chief *R. B. Hayes*
Ground-Water Technical Support Unit

Subject: Jacksonville Naval Air Station RI/FS Work Plan
Jacksonville, Fl.
Volume 5 and 6

The generic Ecological Risk Assessment (Volume 5) has incorporated 5 guidance documents into a very thorough outline which, in theory, can determine site-related ecological impacts for each PSC unit.

However, in reviewing the RI/FS Work Plan for PSC units 26 and 27, the Risk Assessment only implements the generic plan to the extent of human risk. Sections 4.6.1 through 4.6.6 (of the generic risk assessment work plan) need to be addressed beyond the statement that the ecological assessment will follow the generic work plan. There is site-specific and risk characterization that must be considered to design the sampling plan, before the sampling effort occurs. For example, with detections limits higher than AWQC acute and chronic values (protective of aquatic life) aquatic and sediment toxicity tests should concur with sediment and surface water sampling to determine if toxic levels of contaminants (below detection levels) are present and migrating off-site. This system drains into the St. Johns River, a valuable estuarine resource with a number of potential biological receptors. These receptors have not been identified. Biological studies initiated early in the Remedial Investigation are necessary to identify the need, if any, for further biological data for the Ecological Risk Assessment.

Specific comments:

- 1. Volume 6, Table 5-3 (ARARS), the acute and chronic FWQC values (ug/L) should be updated:

methylene chloride	19300	1930
PCBs	0.2	0.014
cadmium	1.79	0.66
chromium	16	11
lead	33.7	1.32
copper	9.2	6.5

and footnote "5/" should read "enforceable under Superfund".

2. Section 4.5 sediment and surface water sampling should include a sampling point closer to the drains entry into the St. Johns River.

If you have any questions, please contact me at x3866.



~~RAV~~ 000203 7549
~~12-11-10~~

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Bob Martinez, Governor Dale Twachtman, Secretary John Shearer, Assistant Secretary

December 5, 1990

Mr. Joel Murphy
Code 11432
Department of the Navy
P.O. Box 10068
Charleston, S.C. 29411-0068

Dear Mr. Murphy:

Department personnel have completed the technical review of the Preliminary Draft Navy Installation Restoration Program, September 1990, Vols. 1,5,6, Naval Air Station, Jacksonville, Florida. I have enclosed a memorandum from Dr. James J. Crane to me. It documents the Department's concerns on the report.

Please note that our concurrence of no further action for ten of the potential sources of contamination is conceptual at this time. As per a previous telephone conversation with you, our final decision will be based upon additional documentation to be submitted in the future.

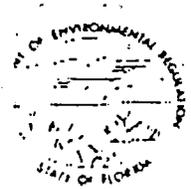
If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,

Eric S. Nuzie
Federal Facilities Coordinator

ESN/mlr

cc: Ashwin Patel



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

To	Location
To	Location
To	Location
From	Date

Interoffice Memorandum

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

FROM: Dr. James J. Crane, Environmental Administrator, Technical Review Section, Bureau of Waste Cleanup *IGN for SSC*

DATE: November 21, 1990

SUBJECT: Preliminary Draft Navy Installation Restoration Program, September 1990, Vols. 1, 5, 6, Naval Air Station, Jacksonville, Florida

I've reviewed the subject documents and offer these comments for the Navy's consideration. The documents include:

- 1) Vol. 1 - Installation Restoration Program Organization and Planning, September 1990
- 2) Vol. 5 - Generic Remedial Investigation/Feasibility Study Work Plan, September 1990
- 3) Vol. 6 - Specific Remedial Investigation/Feasibility Study Work Plan for PSC 26 and PSC 27, September 1990

I've arranged my comments to follow the above format.

Volume 1

Program Management Plan - No comments.

Site Description - Page 2-5 which describes PSCs 31-35 is missing from our copy.

Environmental Setting - No comments.

Site Prioritization Plan - Seventeen PSCs were proposed for no further action. We agree that ten of these PSCs more than likely would be eligible for NFA: PSCs 1, 6, 20, 21, 24, 25, 31, 34, 35, 37. Several of the PSCs merit some degree of additional investigation:

Old Disposal Area (PSC No. 9)

Since such indiscriminant disposal took place at this site, is it certain that other constituents other than metals or volatile halocarbons (601 VOCs) are not present? If fuels or creosote wastes were disposed of, aromatic volatile hydrocarbons and base neutral organics should be analyzed for. Although the area reportedly was used for disposal of garbage, construction debris and a few drums, it appears that the soil test results that indicated the disposal of industrial wastes on the site were not anticipated from the results of the IAS file search and interviews. Since this was the case, I recommend a broader spectrum of analyses since unknowns could have been disposed of.

This site again has the recommendation of no further action based on an opinion of no imminent hazards. Even if further analyses show no additional contamination, the low concentrations of several VOC's should be evaluated by a risk assessment.

Building 119 (PCC No. 10)

Details of the Closure Plan, Report and tests should be provided.

Glass Bead Disposal Area (PSC No. 17)

The Preliminary Assessment (IAS) recommended a Confirmation Study since RCRA considered the beads a hazardous waste by virtue of EP toxicity test results and large quantities were disposed of. We have no documentation of the Confirmation Study being conducted. Site 17 does not appear in either the SSI or the LSI.

Fort Dix K-7 (PSC No. 22)

Soil sampling of metals associated with small arms ammo should be carried out. Results of soil sampling could be evaluated to determine whether further work, including groundwater sampling may be necessary.

Old Skeet Range (PSC No. 23)

Soils should be analyzed for lead. Other sampling may be necessary if the standpipes are connected to underground tanks or may have been used for disposal.

Base Landfill (PSC No. 32)

For a site this large, several more wells may be prudent to support a no further action.

Transformer Burial Area (PSC No. 39)

It seems that the area should be investigated by geophysical techniques such as metal detectors, magnetometers or EM. Were interferences too widespread to apply these techniques?

EX-East Industrial Waste-Water Treatment Plant Discharge Area (PSC No. 4Q)

It seems that sampling for total metals may be necessary to evaluate the impact on the environment. EP toxicity is not really a useful measure of toxicity through this pathway, sediments.

The categorization of the PSCs for Site Screening Actions on pages 4-13 to 4-15 appear to be reasonable. The Petroleum Hydrocarbon Sites, once their status is agreed to by EPA, should be divested from the RI/FS process and handled separately as the Petroleum Agreement between FDER and the Navy spells out. The PSCs for which RI/FS are identified are acceptable. Depending on the results of further site screening work, additional sites may be added as necessary.

Events Scheduling - Without seeing the Site Management Plan and knowing how many other operable units are yet to be defined, it's difficult to agree to only these two operable units being worked on in the next two years. I think a working meeting may be necessary to sort out the priorities and the time frames.

Volume 5

Introduction - No comments.

Scoping - No comments.

Remedial Investigation Field Tasks - The range, variety and types of investigative methods and procedures appear to be reasonable and acceptable for their purpose. Please note in reference to 3.4.5.3(b) on page 3-55, FDER does not consider risk levels below 1×10^{-6} to be acceptable.

Risk Assessment - No comments.

Treatability Studies - No comments.

Feasibility Study Tasks - Please note that FDER is an equal member of the Federal Facility Agreement, thus references on pages 6-9, 6-10, 6-16 should include FDER, EPA and the Navy in the determination of relevance and appropriateness and applicability issues concerned with ARARs.

Quality Assurance/Quality Control - No comments.

Modeling Programs - No comments.

RI/FS Work Plan QA/QC Plan - No comments.

Eric Nuzie
November 21, 1990
Page Four

Basic Sampling and Analysis Plan and Generic Quality Assurance Program Plan - Part I (Generic Quality Assurance Program Plan) - I've provided review comments for the various QA/QC components of these volumes. I did not submit these documents to the FDER QA/QC Section for approval. Since the QA/QC plans must satisfy EPA format and requirements (to which the FDER requirements are very similar), if the documents are deemed by EPA QA/QC reviewers to be acceptable and satisfactory, this will constitute acceptability of the documents by FDER. In Section 13.1, the FDER Project Manager should also be included in the sentence on line 6 in the 2nd paragraph.

Part II (Generic Field Sampling Plan) - No comments necessary.

Data Analysis Plan - No comments.

QA/QC Final Product/Report Plan - No comments.

Volume 6

Specific RI/FS Work Plan for PSC 26 and PSC 27 - In Table 5-4, Remedial Action Alternatives #2 and #4 are the same. Apparently one other alternative was inadvertently left out.

Quality Assurance Project Plan for Phase I Inv. of PSC 26 and PSC 27 - On page 9 of 21 the work plan states; "Each soil sample will be screened immediately after for organic vapors according to the collection procedure published in Chapter 17-770.200(2) of the Florida Administrative Code (Attachment I). Please note that this procedure only applies to gasoline group, kerosene group or mixtures of these groups. This procedure [stated in Attachment I] is not valid for used oil under Chapter 17-770 F.A.C. It may be that samples that do not register highly on the OVA may still be enriched in non-volatile organics, PCBs, pesticides or metals. If only samples with the highest OVA readings are analyzed in the laboratory, inaccurate results may occur.

JJC/sr

Attachments