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LETTER REGARDING U S EPA REGION IV REVIEW COMMENTS ON TECHNICAL REVIEW
OF FINAL DRAFT FOCUSED REMEDIAL INVESTIGATION FEASIBILITY STUDY FOR
POTENTIAL SOURCES OF CONTAMINATION 2, 41 AND 43 AT OPERABLE UNIT 2 (OU 2)
NAS JACKSONVILLE FL
2/22/1994
U S EPA REGION IV



RCVD 2/28/94 *Handwritten*

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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4WD-FFB

FEB 22 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joel G. Murphy
Department of the Navy - Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr., P.O. Box 10068
Charleston, South Carolina 29411-0068

SUBJ: Technical Review Comments for the Final Draft Focused Remedial Investigation/Focused Feasibility Study Report for PSCs 2, 41 and 43 at Operable Unit 2 Naval Air Station Jacksonville, Florida

Dear Mr. Murphy:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the Focused Remedial/Focused Feasibility Study (FRI/FFS) for Potential Sources of Contamination (PSCs) 2, 41 and 43 at Operable Unit (OU) 2, Naval Air Station (NAS) Jacksonville. EPA's comments are in enclosed.

If you have any questions or comments about this matter, please contact me at the above address or call me at (404) 347-3016.

Sincerely,

James W. Hudson
Remedial Project Manager
Federal Facilities Branch

cc: Eric Nuzie, FDEP
Jorge Caspary, FDEP
Kevin Gartland, NAS Jacksonville
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Post-It™ brand fax transmittal memo 7671 # of pages = 3

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GENERAL COMMENTS

Although generally clear and complete, the Final Draft FRI/FFS Report does include minor errors or data gaps which should be addressed. The Final Draft FRI/FFS Report should include references and/or field observations to support all assumptions made in the remedial alternative evaluations and should describe the rationale for selecting only 10 percent of samples that were screened in the field for contract laboratory program (CLP) analysis. These data gaps are discussed in more detail in the specific comments section; other general comments pertaining to the overall review of the Final Draft FRI/FFS Report are listed below:

1. The Final Draft FRI satisfactorily characterizes the nature and extent of contamination in vadose-zone material at PSC 2 and within the engineered sludge-drying structures at PSCs 41 and 43. The Focused Qualitative Risk Assessment (FQRA) adequately identifies contaminants of potential concern and qualitative risks to human health and the environment in the vadose zone at PSCs 2, 41 and 43. The Final Draft FFS sufficiently establishes remedial action objectives and identifies appropriate technologies and remedial alternatives to support interim remedial actions. The FQRA also adequately determines if the remedial actions proposed would be protective of human health and the environment.
2. The Final Draft FRI/FFS Report clearly and completely presents evaluations of several remedial alternatives presented for the recovery of light nonaqueous-phase liquid (LNAPL) and the removal and storage/treatment/disposal of contaminated soil at PSC 2 and sludge-drying bed filter media at PSCs 41 and 43. The evaluations of remedial alternatives were well organized and easy to follow and comprehend.
3. The LNAPL plume and contaminated soil/filter media at PSCs 2, 41 and 43 appear to be sources of continuing groundwater contamination. Initiating and implementing source of contamination control as an interim remedial action at PSCs 2, 41 and 43 appears to adequately reduce risks while remaining within the scope of the overall remedial strategy at OU 2.

SPECIFIC COMMENTS

1. Page 3-1, Paragraph 6: The text does not clearly explain the basis for selecting the number and locations of samples that were screened for 14 purgeable volatile organic compounds (VOCs). Explain the sample selection process as well as the selection of the specific VOCs for screening. Also, list the VOCs that are referred to in Appendix A of the Final Draft FRI/FFS Report. State the rationale for

selecting only 10 percent of the field-screened samples at PSC 2 to be analyzed by the Contract Laboratory Program (CLP) for 12 VOCs, 5 metals and total petroleum hydrocarbons (TPH) which are shown in Appendix B of the Final Draft FRI/FFS Report. Without a rationale, the number and appropriateness of samples selected for CLP analysis cannot be adequately determined. Explain why the CLP samples were not analyzed for the full-scan Target Compound List (TCL)/Target Analyte List (TAL). Even a FQRA should be supported by data quality objective (DQO) Level IV full-scan TCL/TAL data.

2. Page 5-10, Paragraph 3: Include any available DQO Level IV CLP analytical data in the discussion to further support the 50 milligrams-per-kilogram (mg/kg) TPH cleanup level used to estimate the volume of soil to be excavated.
3. Page 5-10, Paragraph 4: In lieu of baildown tests, provide references and/or literature that substantiate the assumption that the thickness of the LNAPL in the strata at PSC 2 is one-fourth the thickness detected in observation well TPZ-5.
4. Page 5-10, Paragraphs 5, 6 and 7: The reference to Appendix E for calculations to support volumetric estimates appears incorrect. Appendix F provides calculations and documentation that support the FFS.
5. Page B-1, Paragraph 1: Include the rationale for selecting only 10 percent of the field-screened samples at PSC 2 to be analyzed by the CLP for VOCs, metals and TPH rather than analyzing for the full TCL/TAL. Without this rationale, it cannot be determined if the number of samples analyzed by the CLP is adequate, particularly in support of the FQRA.
6. Pages D-26, D-28, D-29, Tables D-10 and D-11: The heading "Metals and Cyanide (mg/kg)" is placed in portions of the tables related to organic compounds whose units are micrograms per kilogram. Please revise to resolve ambiguity.
7. Page F-3, Volume of LNAPL to be recovered at PSC 2: Cite references and provide field observations that support the assumptions for TPH mobility, LNAPL thickness and soil porosity.