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NAS JACKSONVILLE
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT REMEDIAL
INVESTIGATION FOR OPERABLE UNIT 2 (OU 2) NAS JACKSONVILLE FL
7/10/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

6972-7559

~~435-8587~~

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 10, 1997

Mr. Anthony Robinson, Code 18511
Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr., P. O. Box 190010
Charleston, South Carolina 29411

RE: Draft Remedial Investigation (RI) for Operable Unit 2.
Naval Air Station Jacksonville, Florida

Dear Mr. Robinson:

I have reviewed the above referenced document dated February 1997 (received February 19, 1997). As discussed in partnering meetings, the delay in the review of this document is due to a prioritization of current projects being delivered by NAS Jacksonville and reviewed by the undersigned. Detailed below are comments on the document. Please note, the comments should be adequately addressed before concurrence with the Final version of the RI.

General Comments

1. The text and tables refer to background concentrations for all media, however, I could not find a table with the detected background concentrations for NAS Jacksonville. At a minimum, a table showing detected concentrations and figures showing the locations used to generate all media background values should have been provided.
2. I could not find a table showing the depths and screen intervals of all the Operable Unit 2 monitoring wells, including the wells part of the RCRA sampling program and background wells. Please provide a table depicting the monitoring wells construction details requested in this comment.

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Specific Comments

3. Page 2-8, two years to prepare an IRA completion report seems inordinate. The Navy may be out of compliance with the provisions of Chapter 62-770. Please provide a firm date for delivery of this report.
4. Page 2-13, Table 2-4 and others: the captions at the end of the tables are confusing. The text states "the NAS Jacksonville background study was not complete" yet the text also states "background screening concentrations in the Focused RI/FS were two times the *average background concentrations*". If the background study was not complete, which *average background concentrations* is this sentence referring to? Was a separate background study conducted at PSC 3? These captions should be corrected.
5. Page 2-19, last paragraph: related, in part, to the previous comment. If CPCs (COPCs is a better term) were selected by comparing to "background concentrations" and according to the previous text the background study was not complete, are we to assume, as the text implies, that surface and subsurface soil data around OU-1 constitute the NAS Jacksonville background study? Please clarify.
6. Page 2-23, Table 2-6: while it does not revert much importance now that the remedial action has taken place, please indicate whether the chromium detected in the soil and filter media was tri or hexavalent?
7. Page 3-16, Section 3.8.2: please indicate the specific source of Figure 3-10. Was it a specific OU-2 groundwater flow model or an expanded figure based upon the station-wide study presented in Appendix G?
8. Page 4-17, Section 4.3.2: please show on Figure 4-7 the location of USGS wells JXMW123A and MW 123.
9. Page 4-17, Section 4.3.2.1: Table 4-2 does not show the results of the sampling event alluded to in the introductory sentence. If the results of the sampling event are presented elsewhere (such as Appendix H), it would help the reviewer point out where in the report the results are found.
10. Page 6-10, Table 6-4: correct the title "SWQC". This should refer to sediment criteria for estuarine environments and not to surface water. Also, clarify if the NAS Jacksonville background study includes surface water and drainage works.

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11. Page 6-54, Section 6.4.6: please justify why the exceedances of ambient water quality criteria for aluminum are not site related.
12. 7-8, Section 7.1.2: are the concentrations presented in Table 7-3 for the sampling and analysis event conducted in October 1996 and alluded to in page 4-17?
13. Section 7.0, Tables 7-1, 2, and 3: please show in a figure the locations of the "U" designated samples.
14. Section 8: in order for the Department to concur with a No Further Action, the Navy must provide the closure documents of all pending reports, verify that the removal actions met cleanup objectives, and that risk from exposure to the sites is below FDEP's accepted threshold levels.

Human Health Risk Assessment

15. Page J-1, middle of first paragraph: what is considered surface soil?
16. Page J-1, last sentence of first paragraph: I suggest emphasizing that soils at PSCs 2, 3, 41, 42, and 43 were not evaluated because these sites have sustained source removal actions.

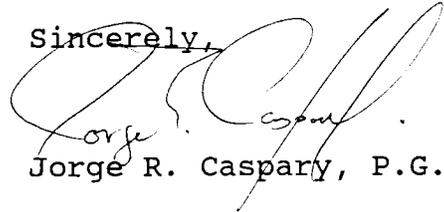
Ecological Risk Assessment

17. Many errors were found in the database calculations. I suggest the consultant review the calculations more thoroughly. Refer to Table T-2, T-3, etc.
18. Page 5-50, Section 5.5.3: human guidelines for Chromium are not applicable to ecological aspects. Chromium levels obtained on indicator species should have been used in the screening phase of the ecological risk assessment.
19. Page R-6: where is Figure R-1?
20. Page R-14, Table R-2: please review the units used in the analysis. Our spot check does not yield the same units.

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

Sincerely,



Jorge R. Caspary, P.G.

cc: Phylissa Miller, ABB-Jacksonville
Diane Lancaster, NAS Jacksonville
Hermann Bauer, Bechtel
Martha Berry, EPA-Atlanta
Ashwin Patel, FDEP Northeast District

TJB _____ JJC _____ ESN _____

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