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U S NAVY COMMENTS ON TIER II SAMPLING ANALYSIS PLAN RRPORT HANAGR 1000
NAS JACKSONVILLE FL
3/1/2011
U S NAVY

UFP-SAP Review

Reviewer: NAS Jacksonville Partnering Team

Document: Hangar 1000 Tier II SAP

Date: 01-Mar-11

Comment Number	Worksheet and/or Section	Reviewer	Statement or Issue	Comment	Response to Comment
1		Adrienne Wilson, NAVFAC SE RPM		line 92 reword to read "Monitoring will continue on a semiannual basis until after 5 years of monitoring has taken place."	Text has been corrected
2		Adrienne Wilson, NAVFAC SE RPM		line 350 add the word "closed" before the words Tanks A and B.	Text has been corrected
3		Adrienne Wilson, NAVFAC SE RPM		line 360 please provide the specific date in lieu of the word "current" in front of FDEP	Replaced the word "current" with "February 2005"
4		Adrienne Wilson, NAVFAC SE RPM		Lines 362 to 367...it sounds like the tanks were closed after the request to include in the IR program is 1996 the correct request date? If so is 1997 the closure date it reads like the tanks were closed then a consent order was issued and then a request was made to include in IR program but te dates don'r seem to agree with the chronology. Please check this.	The referred paragraph was amended to say the following: "The Navy submitted closure documentation of the Hangar 1000 tank system to FDEP in December of 1993 FDEP accepted the closure certification in October 1997. However, due to elevated levels of contamination in groundwater documented in the 1993 report, post-closure actions were required in NAS Jacksonville's Post Closure Permit dated November 2001. RCRA monitoring was subsequently conducted. An agreement was reached to allow cleanup to be conducted under CERCLA. RCRA monitoring continues on a semi-annual basis. The USEPA policy memorandum entitled "Coordination between RCRA Corrective Action and Closure and CERCLA Site Activities," dated September 24, 1996, and Section VII of the FFA (the RCRA/CERCLA integration provisions) allow cleanup of a RCRA-regulated Unit under CERCLA so long as the cleanup provides concurrent compliance with RCRA. In this case, even though Hangar 1000 shall be cleaned up under CERCLA, the unit remains an RCRA-regulated unit.
5		Adrienne Wilson, NAVFAC SE RPM		line 372 rewrite last sentence as follows: "As a result the Navy and FDEP agreed that groundwater monitoring..."	Text has been corrected

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6		Adrienne Wilson, NAVFAC SE RPM		Line 502 add word "respectively" after 2010.	Text has been corrected
7		Adrienne Wilson, NAVFAC SE RPM		pg 24-CSM shows GW plume stopping at south side of yorktown Ave, do we have a clean line of data to support this--- wells H10MW19 & MW 23?	The clean boundary depicted in the CSM was determined via DPT data. MW 23 is a clean well, however, MW 19 is not.
8		Adrienne Wilson, NAVFAC SE RPM		line 644 should that read "until site closeout", until partnering team agrees there is no longer a source. The term site closure sounds like a RCRA term for the use of the facility...but here I think we are talking about the site being closed out of the IR program or NFA, no longer requiring monitoring in the CERCLA realm.	Text has been corrected
9		Adrienne Wilson, NAVFAC SE RPM		line 627 should that be "Analytical Approach"??	Yes, text has been corrected
1		Tim Curtin, NAVFAC SE IR Mgr		Page 4, line 75: Did we do Chem Ox there too?	Yes, Ch2MHill did Chem Ox at the request of RCRA FDEP and it did not work.
2		Tim Curtin, NAVFAC SE IR Mgr		Page 4, line 87: Change "a surface water sample" to "surface water samples".	Text has been corrected
3		Tim Curtin, NAVFAC SE IR Mgr		Page 9, Figure: Should the line from me to Tom Johnson be dotted rather than solid?	Figure has been corrected with dashed line between Tim Curtin and Tom Johnston
4		Tim Curtin, NAVFAC SE IR Mgr		Page 20, line 524: Delete "into" after "entering".	Text has been corrected
5		Tim Curtin, NAVFAC SE IR Mgr		Page 26, lines 568 & 572: Delete "semiannually/semiannual". This may eliminate the need to modify this plan when we start monitoring annually.	text has been deleted
6		Tim Curtin, NAVFAC SE IR Mgr		Page 27, lines 623-625: What does "same time" mean? Same day, minute, week?	The text was modified to say that samples would be collected "during the same field event". Given the scope, this should occur within the same week.
7		Tim Curtin, NAVFAC SE IR Mgr		Page 34, line 740: Add "ic" to "electron".	Text has been corrected
8		Tim Curtin, NAVFAC SE IR Mgr		Page 34, lines 759-760: Delete "after the analytical results of the groundwater and soil samples are received from the laboratory and reviewed". We use historical HW profile values to dispose of wastes and do not wait for analytical results for routinely sampled wells.	Text has been corrected

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1		Pete Dao, USEPA	Tier II vs Tier I UFP SAP	Team, I am reviewing this and everything looks fine except for one issue. I know that it was brought up in one of our meeting that future QAPP was going to be submitted using the Navy Tier II streamlined format. I was hoping for directions/decision from the whole Tier II. Since that isn't happening anytime soon, could you give me the rationale, if one exist from Navy Tier II, for excluding some of the checklist? Part of the requirement for me as an EPA approving official is making sure that all the content of the checklists are covered, and if not, to provide a reason why not. If this route does not work out, another option is to have references for each of the missing check list sheets to pages of previously approved QAPP since many deal with lab QA/QC procedures, calibrations etc that are standard. It would help if we had a site wide QAPP for these standard procedures that does not change from site to site where it could be referenced and not included in each site specific QAPP, which is what I think the Navy Tier II streamlined QAPP is attempting to do.	In order to address your comments, we have added Worksheets # 3, 4, 7, 8, 13, 16, 22, 24, 25, 26, 27, 29, 31, 32, and 33 as Appendix D. Additional Information that is also included in Appendix D: "Several other worksheets within this Tier 2 UFP-SAP are provided in other locations and formats than found typically in Tier 1 UFP-SAP. The following summarizes where this information can be found: <ul style="list-style-type: none"> • Worksheet #18 is provided as Table 7-1 • Worksheet #19 is provided in Section 8.3.1 • Worksheet #20 is provided in Section 8.3.2 • Worksheet #21 is provided as Section 8.2 • The information in Worksheet #30 of the Tier 1 UFP-SAP is provided in Section 8.3.1 • Worksheet #37 is provided as part of Section 8.1.10 (Additional Project-Related Tasks)"
1	1	Dave Grabka, FDEP		in the Executive Summary, page 4, last paragraph, first sentence, please break total 1,2-DCE into cis-1,2-DCE and trans-1,2-DCE. Also please change tetrachloroethane (PCA) to tetrachloroethene (PCE) to be consistent with Worksheet #9 and previous analyses.	1,2-DCE (total) is used in the UFP-SAP to be consistent with the ROD, which set PRGs for total 1,2-DCE.
2	4	Dave Grabka, FDEP		In Section 4.2, page 15, first paragraph, third sentence, please change "begin" to "began."	Text has been corrected
3		Dave Grabka, FDEP		In Section 4.2, page 15, third paragraph, the discussion on the status of soil contamination at the site is not clear. When it says that review of closure soil sample data indicated no exceedances of "current" FDEP residential SCTLs, does the word "current" mean current as in today's SCTLs or does it mean SCTLs that were "current" at the time the closure soil sample data was reviewed? Since tank and piping removal and the excavation of contaminated soil occurred in 1994 when the Department did not even have promulgated SCTLs and since it does not say when the closure soil sample data was reviewed, it should be made more clear exactly what is being stated in that paragraph with regards to remaining soil contamination.	The described text was amended to say the following: "During excavation and removal of the tanks, soil containing concentrations of contaminants exceeding industrial use risk based target concentrations was delineated, excavated, and transported off-site for disposal. Subsequently, review of closure soil sample data indicated no exceedances of February 2005 FDEP residential Soil Cleanup Target Levels.

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4		Dave Grabka, FDEP		<p>In Section 4.2, page 15, fourth paragraph, the timeline and programmatic status of the site is confused. The paragraph starts out with FDEP accepting the closure certification of the Hangar 1000 tank system in October 1997. The second sentence states the post-closure actions were required in a consent order issued by FDEP but gives not date. The third sentence says that in response to the consent order, the Navy and FDEP held discussions regarding the regulatory status of Hangar 1000, but gives no dates for those discussions. In the fourth and final sentence of the paragraph, it says that on August 5, 1996, the Navy formally requested to be allowed to manage remediation under the Installation Restoration (IR) Program. This date is before the date the Department accepted closure of the Hangar 1000 tank system. Also, it does not say whether the Department approved the Navy's request to manage the site under the IR Program and on what date it approved or denied the request.</p>	<p>The referred paragraph was amended to say the following: "The Navy submitted closure documentation of the Hangar 1000 tank system to FDEP in December of 1993 FDEP accepted the closure certification in October 1997. However, due to elevated levels of contamination in groundwater documented in the 1993 report, post-closure actions were required in NAS Jacksonville's Post Closure Permit dated November 2001. RCRA monitoring was subsequently conducted. An agreement was reached to allow cleanup to be conducted under CERCLA. RCRA monitoring continues on a semi-annual basis. The USEPA policy memorandum entitled "Coordination between RCRA Corrective Action and Closure and CERCLA Site Activities," dated September 24, 1996, and Section VII of the FFA (the RCRA/CERCLA integration provisions) allow cleanup of a RCRA-regulated Unit under CERCLA so long as the cleanup provides concurrent compliance with RCRA. In this case, even though Hangar 1000 shall be cleaned up under CERCLA, the unit remains an RCRA-regulated unit.</p>
5	4	Dave Grabka, FDEP		<p>In Section 4.5.2, the discussion concerning the hydrogeology of the site is incomplete. There is mention of hydraulic conductivity of Layers 1 and 3, but no mention of the hydraulic conductivity of Layer 2 and no mention of horizontal and vertical hydraulic gradients measured at the site.</p>	<p>The following sentence was amended in Section 4.5.2 to include reference to groundwater elevation data: "The clay unit (layer 2) is a low permeability dry clay that prevents communication between the shallow unit and the second sand unit (layer 3), as noted in groundwater elevation data collected during the RI/FS."</p>
6	8	Dave Grabka, FDEP		<p>In section 6, please specify that water level measurements will take place before monitoring well sampling. Based on the place the discussion of water level measurements is located within the section (after monitoring well sampling), one might infer that Tetra Tech plans to collect water level measurements after groundwater monitoring well sample collection. Also, the subsection on monitoring equipment calibration also comes after the subsections on monitoring well and surface water sampling.</p>	<p>The water level measurement section was moved prior to the groundwater monitoring well section and the following sentence was amended to reflect that water levels will be taken prior to monitoring well sampling: "Water level measurements will be obtained from each well in the monitoring program and other nearby accessible wells prior to groundwater monitoring well sampling."</p>