

32212-000

23.11.00.0023

08 AUG 1994

Mr. Peter Redfern
ABB-ES, Inc.
1536 Kingsley Avenue, Suite 127
Orange Park, FL 32073

Dear Mr. Redfern:

In your letter to Florida Department of Environmental Protection (FDEP) dated July 13, 1994, you had requested answers to the following questions concerning Operable Unit Three (OU3) and Hangar 1000. Mr. Ashwin Patel replied to Ms. Diane Lancaster, Facilities and Environmental Department, on August 1, 1994.

Questions concerning OU3, Plating Shop:

1. Will the requirements in the RCRA Closure Permit Application be achieved once the successful removal of the tanks, piping, and associated appurtenances are complete? *Yes.*
2. Are there any remaining RCRA Closure Permit requirements once the tanks, et al, are removed that apply to future CERCLA responses for the remaining hazardous wastes and substances at the Old Plating Shop? (RCRA is still applied as an ARAR of course). *40 CFR 264.197 may require a post closure permit if CERCLA doesn't clean up the site.*
3. Since the Old Plating Shop is within the boundary of OU3 and is considered part of a PSC, will long-term CERCLA groundwater restoration and monitoring at OU3 satisfy the substantive requirements of RCRA and the permit? What procedural permit requirements will remain, if any? *Only if a post closure permit is required, otherwise clean up under CERCLA using RCRA as ARAR.*

Questions concerning Hangar 1000:

1. Will the closure permit be considered satisfied once the physical removal of the tanks and decontamination of the associated piping are complete? *There is no closure permit on Hangar 1000. It is a consent order. If both soil and groundwater are below risk based criteria, consent order will be satisfied.*
2. Can long-term groundwater restoration and monitoring be conducted as a CERCLA response and meet the substantive requirements of RCRA and the permit? *Consent order. May have to re-establish risk based cleanup criteria under CERCLA if necessary.*
3. What procedural permit requirements will remain, if any? *None.*

In addition, Mr. Patel responded to the Hangar 1000 Groundwater Monitoring Plan

1. Proposed sampling is acceptable, with the exception that there is no fall-back position. Please provide comment or concurrence with the following statement:

If the soil samples are visibly contaminated, all visible contamination will be removed and the soil sampled. If the soil samples are reported contaminated based on analytical results, approximately one cubic foot of soil will be removed and disposed as hazardous waste, and the site will be resampled. If the soil is still contaminated, NAS will have the option to either continue further investigation, or investigate the site for CERCLA remediation.

2. The new monitoring well locations are acceptable, as long as the design remains the same.

3. We need to add sampling statements concerning the mystery line. Please comment on adding the following statement (same verbiage as written for other piping):

Soil directly under the drain lines will be sampled during the removal of the lines at 25 feet intervals, unless indications of possible contamination are present. Specific indications include broken or eroded piping and/or stained soil. The sampling plan will be modified, moving one of the scheduled samples to the area of possible contamination. We understand that the total number of samples will not exceed the estimated quantity.

4. The washrack/manhole plan is acceptable.

If you have questions, please contact Ms. Diane Lancaster, Facilities and Environmental Department, at (904) 772-2717.

Sincerely,

KEVIN H. GARTLAND
Director, Environmental Division
By direction of the Commanding Officer

Copy to:
SOUTHNAVFACENGCOM (Codes 1824, 1847)
ROICC JAXA

bcc:
111 (2) 181CP (2) ✓184 184BR 184DL 184S
05 AUG 94 FED LANCASTER/alm