



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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4WD-RCRA & PF

Mr. Joel Murphy
Southern Division
NAVFACENGCOM
Mailcode 18213
P.O. Box 10068
1255 Eagle Drive
Charleston, S.C. 29411-0068

Re: Comments on the RI/FS Work Plan for Naval Air Station
Jacksonville, Jacksonville, Florida

Dear Mr. Murphy:

EPA has reviewed and commented on the following documents as required under the Federal Facility Agreement (FFA):

- 1) The Site Specific RI/FS Work Plan for Operable Unit 1 (PSC 26 and 27).
- 2) The Generic Quality Assurance Project Plan
- 3) The Health and Safety Plan.

Comments on these Plans are enclosed.

EPA does not intend to provide comments or concurrence on the Program Organization and Planning (POP) or the Generic RI/FS Work Plan as they are not required under the FFA and they are basically Navy planning documents that require no concurrence from EPA. All EPA, Navy, FDER interactions and schedules will be handled via the FFA. However, EPA would like to note the confusion of the operable unit concept in Section 4.0 (Site Prioritization Plan) of the POP. An operable unit as defined in CFR Vol. 55, No. 46, means "a discrete action that comprises an incremental step toward comprehensively addressing site problems. This discrete portion of a remedial response manages migration, or eliminates or mitigates a release, threat of release, or pathway of exposure. The clean-up of a site can be divided into a number of operable units, depending on the complexity of the problems associated with the site. Operable units may address geographical portions of a site, specific site problems, or initial phases of an action, or may consist of any set of actions performed over time or any actions that are concurrent but located in different parts of a site."

The assignment of sources in Section 4.2.3 to "operable units" should be changed to assignment to "categories" instead.

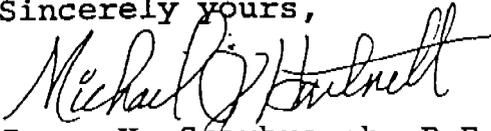
Investigation if any or what type and to what extent should be a category only. To assign sources to operable units, they should be broken into their geographical locations or common wastes or concurrent actions. For example PSC 26 and 27 were grouped together in one Work Plan because of their physical proximity. Together they are Operable Unit 1. They have one Work Plan, will be investigated together, have one Record of Decision and design and construction of a remedy will be concurrent. Other sources or contaminated media should be broken down likewise. The breakdown into operable units in Section 4.2.3.4 Page 4-16 of sources requiring a full RI/FS is satisfactory and is how operable units should be selected.

However, EPA would prefer the Navy to drop Section 4.0 from this document. This prioritization belongs in the Site Management Plan (SMP) under the FFA. EPA has reviewed previous Installation Restoration Program Reports at NAS Jacksonville and does not agree with the following sites being placed in a No Further Action Category for the SMP: 9, 10, 17, 20, 25, 32, 34 and 40. In revising this section for the SMP, these should be categorized as part of site screening or RI/FS. In addition, of the sites in the site screening category, EPA would like site 30 placed in the RI/FS category based on previous analyticals which indicated high levels of bis (2-chloroethyl) ether. Sites undergoing screening that show any level of contamination at all should have at least a preliminary risk assessment, a preliminary site characterization report and a Record of Decision.

EPA also has a general comment that is not specific to the Work Plan for Operable Unit 1 but involves the potential for offsite migration of contaminated groundwater from a number of sources on base. The community surrounding NAS Jacksonville does utilize the groundwater and although it may not be used as a drinking water source, exposure could be possible through dermal and inhalation routes. The Navy needs to sample private wells in the area. The Navy should present a sampling plan for the private wells with the draft final Work Plan for Operable Unit 1.

If you have any questions regarding the enclosed comments please contact Ms. Nancy Dean at (404) 347-3016.

Sincerely yours,

for 

James H. Scarbrough, P.E., Chief
RCRA & federal Facilities Branch
Waste Management Division

cc: Kevin Gartland, NAS Jacksonville
Eric Nuzie, FDER