

N60201.AR.000121
NS MAYPORT
5090.3a

LETTER REGARDING NOTICE OF TECHNICAL INADEQUACY OF PHASE 1 RESOURCE
CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION REPORT FOR GROUP
1 NS MAYPORT FL
4/20/1993
U S EPA REGION IV



#145

Naval Station Mayport
Administrative Record
19.01.00.0099

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 20 1988

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Captain J.B. Mitchell, Jr.
Commanding Officer
U.S. Naval Station Mayport
P.O. Box 265
Mayport, Florida 32228

RE: Notice of Technical Inadequacy (NOTI) of RCRA Facility
Investigation Phase I Report (RFI Phase I Report) for the
Group I Solid Waste Management Units 2, 3, 4, 5, 13 and 22
at U.S. Naval Station Mayport, Mayport, Duval County,
Florida, EPA I.D. No. FL9 170 024 260

Dear Captain Mitchell:

The United States Environmental Protection Agency (EPA) has reviewed the Draft Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report for U.S. Naval Station Mayport/Group I Solid Waste Management Units (SWMU's) 2, 3, 4, 5, 13 and 22 and has determined it is inadequate. The general and specific comments are enclosed.

In accordance with condition II.G.5 of your EPA RCRA permit effective March 25, 1988, a Final RFI Report must be submitted to EPA no later than thirty (30) days after receipt of this letter. Note that until the RFI Report is approved, you have not fulfilled the requirements of permit condition II.G.5 of the EPA RCRA permit effective March 25, 1988. The revised report or pages must be submitted to:

Mr. Joseph R. Franzmathes
Director
Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30365

ATTN: Federal Facilities Branch

Failure to comply with any permit condition may result in sanctions pursuant to Section §3008(a) of RCRA, 42 U.S.C. 6928, as amended, under which EPA may seek the imposition of penalties of up to \$25,000 for each day of continued non-compliance.

Post-It™ brand fax transmittal memo 7671 # of pages > 7
To ABB ENVIRON From NAVSTA MAYPORT

Should you have any questions on the review comments, please contact Mr. James W. Hudson of the Federal Facilities Branch at (404) 347-3016. For questions regarding RCRA compliance and enforcement, please contact Mr. Ken Lapierre of the RCRA Compliance Section at (404) 347-7603.

Sincerely,

James S. Kutzman for
Joseph R. Franzmathes
Director
Waste Management Division

Enclosure

cc: Eric Nuzie, FDER
Michael Davenport, U.S. Naval Station Mayport
Art Linton, OPM/FFC
Jim Reed, SODIV 1855
Frank Lesesne, ABB

General Comments

The summarized data and interpretations are presented in a logical, coherent manner. However, the full nature and extent of contamination in sediments, surface water, soil and groundwater have not been fully characterized at each of the SWMUs. Sufficient background data is not provided for each of the SWMUs. Conclusions regarding site characterization for each SWMU are not conclusive. There are low-level contaminants detected at each of the SWMUs, but no rationale is provided for the presence of these contaminants. Generally there are an insufficient number of monitor wells located downgradient of each SWMU. The minimum number of monitoring wells an owner/operator should install in a detection monitoring system is one upgradient and three downgradient wells, as per the RCRA TEGD.

The remaining general comments and issues identified during the review of the document are listed on the following pages. The general comments are organized by SWMU.

SWMU #2, Landfill B

The horizontal and vertical extent of the soil contamination at the suspected polychlorinated biphenyl (PCB) contaminated soil area near Landfill B have not been adequately determined. The data which was collected for the PCB contamination in the soils cannot be correlated to determine the vertical extent of contamination because only surface soil samples were collected. Subsurface soils should be sampled to determine the vertical extent of contamination. Additional surface and subsurface soils should be sampled to determine the horizontal extent of contamination and to establish the boundaries of the PCB contamination in the soil.

There are only two monitoring wells which are downgradient of SWMU #2. An additional deep monitoring well should be installed downgradient of the PCB-contaminated soil area in order to define the horizontal and vertical extent of contamination. The addition of another deep monitoring well would also aid in the determination of whether the detection of cyanide in the groundwater is a localized occurrence.

SWMU #3, Landfill D

The RFI Phase I Report states that the single surface water sample location was chosen to determine whether contaminants from SWMU #3 were migrating offsite via the surface water conveyance system. The surface water flow direction is not presented in the text or the figures. The full nature and extent of surface water contamination have not been fully characterized. The RFI Phase I Report states that the detection

4

of cyanide in the surface water is not the result of a release from SWMU #3. However, justification is not provided for this conclusion. Additional sediment and surface water samples should be collected in the ditch adjacent to SWMU #3. The additional sediment and surface water samples should include both upgradient and downgradient sample locations.

The horizontal and vertical extent of contamination have not been determined for the soils at SWMU #3. The data presented for soil boring sample MPT-2-16S is inconclusive. One soil sample from one boring is insufficient to conclude that soils have not been impacted from releases of hazardous constituents. Additional subsurface soil samples should be collected from the landfill in order to determine the horizontal and vertical extent and nature of contamination in the soils.

The monitoring wells MPT-2-MW 16S and MPT-2-MW-16DD are grouped at the same location downgradient of SWMU #3. As per the RCRA TEGD, additional monitor wells should be installed downgradient of SWMU #3 to define the horizontal and vertical extent of groundwater contamination.

SWMU #4, Landfill E

The full nature and extent of surface water and sediment contamination have not been fully characterized. The RFI Phase I Report states that the single surface water sample location was chosen to determine whether contaminants from SWMU #4 were migrating offsite via the surface water system. Additional surface water and sediment samples should be collected in the ditch at the source area. A surface water and sediment sample should also be collected from the ditch which crosses the SWMU #4 area. The additional surface water and sediment samples should also include both upgradient and downgradient sample locations.

The horizontal and vertical extent of contamination have not been determined for soils at SWMU #4. The data presented for soil boring samples MPT-2-16S and MPT-2-17S are inconclusive. One soil sample collected from two borings is insufficient to conclude that soils have not been impacted by releases of hazardous constituents from this SWMU. In addition, the soil sample collected from the MPT-2-17S location is located too far away from the source area for there to be a correlation between this sample and SWMU #4. Additional subsurface soil samples should be collected from the landfill in order to determine the horizontal and vertical extent and nature of contamination in the soils.

There are an inadequate number of downgradient monitoring wells at the SWMU #4 location. Additional monitor wells should be

5

installed downgradient of SWMU #4 to define the horizontal and vertical extent of groundwater contamination.

SWMU #5, Landfill F

The full nature and extent of surface water and sediment contamination have not been fully characterized. The RFI Phase I Report states that the surface water and sediment sample locations were chosen to determine whether contaminants from the SWMU #5 were migrating offsite via the surface water conveyance system and accumulating in the sediments. An additional sediment and surface water sample should be collected upgradient from the ditch which borders the southeast portion of SWMU #5. Additional sediment and surface water samples should be collected upgradient, downgradient and at the source area in the ditch which borders the northwest portion of SWMU #5.

The horizontal and vertical extent of contamination have not been determined for soils at SWMU #5. The data which was presented for soil boring samples MPT-MW-11S and MPT-MW-12S are inconclusive. One soil sample collected from two borings is insufficient to conclude that soils have not been impacted by releases of hazardous constituents from this SWMU. In addition, the soil sample collected from the MPT-MW-12S location is located too far away from the source area to conclude that there has not been a release to the soil from SWMU #5. Additional subsurface soil samples should be collected from the landfill in order to determine the vertical and horizontal extent and nature of contamination in the soils.

There are an inadequate number of downgradient monitor wells at the SWMU #5 location. Additional monitoring wells should be installed downgradient of SWMU #5 to define the horizontal and vertical extent of groundwater contamination.

SWMU # 13, Old Fire Fighting Training Area

The full nature and extent of sediment contamination have not been determined at SWMU #13. The RFI Phase I Report fails to make the correlation between SWMU #13 and the polynuclear aromatic hydrocarbons (PAHs) detected in the sediments and soils located near SWMU #13. An additional sediment sample should be collected upgradient of SWMU #13 in order to determine the extent of contamination.

The horizontal and vertical extent of contamination of soils has not been determined at SWMU #13. The data which was presented from one soil sample collected from three locations is insufficient to conclude that soils have not been impacted by releases of hazardous constituents from this SWMU. Additional subsurface soil samples should be collected from the three separate bermed areas which make up SWMU #13 in order to

determine the horizontal and vertical extent of contamination in the soils.

There are an inadequate number of downgradient monitoring wells at the SWMU #13 location. Additional monitoring wells should be installed downgradient of SWMU #13 to define the horizontal and vertical extent of groundwater contamination.

SWMU #22, Building 1600 Blasting Area

There are an inadequate number of downgradient wells at the SWMU #22 location. Additional monitor wells should be installed downgradient of SWMU #22 to define the horizontal and vertical extent of groundwater contamination.

SPECIFIC COMMENTS

The specific comments and issues identified during the review of the RFI Phase I Report are listed on the following pages. The comments, grouped by SWMU, are listed in order of occurrence and are organized by page number, paragraph number and figure number, as appropriate.

SWMU #2, 3, 4, 5, 13 and 22

1. Page 3-10, Paragraphs 5 and 6:
The text states that surface or near-surface soil samples were collected from the six SWMUs in Group I at Naval Station Mayport, and that the soil samples were collected from the locations described in the Sampling and Analysis Plan. The text does not state the depths from which the samples were collected.
2. Page 4-19, Figure 4-9:
Figure 4-9 does not clearly depict the background sediment and surface water sample locations, nor does the legend sample depict any symbols which are used for sediment and surface water locations. In addition, Figure 4-9 does not clearly depict the monitor well locations for Group I.

SWMU #2, Landfill B

3. Page 4-46, Figure 4-20 and Page 4-49, Paragraph 4:
The text states that during Phase I field activities one new surficial aquifer piezometer was installed downgradient of SWMU #2. The text also states that the location of existing monitoring wells and piezometers at SWMU #2 are presented in Figure 4-20. However, the location of the newly installed piezometer (MPT-2-P5) is not presented in Figure 4-20.
4. Page 4-58, Paragraph 3 and Page 4-61, Figure 4-24:

The text states that there are no semivolatile organic compounds, pesticides or PCBs detected in groundwater samples at the SWMU #2 location. However, Figure 4-24 indicates that Bis(2-ethylhexyl)phthalate was detected in the MPT-2-MW9S-1 groundwater sample.

SWMU #5, Landfill F

5. Page 4-131, Figure 4-47:
The data which was obtained from surface water sample MPT-2-SW6 and sediment sample MPT-2-SD6 cannot be correlated to determine horizontal or vertical extent of contamination because the surface water and sediment sample were not collected at the same location in the ditch. The surface water and sediment samples should be resampled at the same exact sample location in the ditch.

SWMU #13, Old Fire Fighting Training Area

6. Page 4-156, Paragraph 6 and Page 4-158, Figure 4-57:
The text and Figure 4-57 are not internally consistent, as they attempt to document the location of sediment sample MPT-13-SD-1. The text states that MPT-13-SD-1 is a background sample while Figure 4-57 depicts the MPT-13-SD-1 sample as being downgradient of SWMU #13.