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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT RESOURCE
CONSERVATION AND RECOVERY ACT FACILITY ASSESSMENT WORK PLAN SAMPLING
VISIT WORK PLAN FOR GROUP 3 SOLID WASTE MANAGEMENT UNITS NS MAYPORT FL

7/15/1994

U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365NAVSTA Mayport Administrative Record
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CERTIFIED MAIL
RETURN RECEIPT REQUESTEDCommanding Officer
c/o Michael Davenport
U.S. Naval Station Mayport
P.O. Box 265
Mayport, Florida 32228SUBJ: Technical Review Comments for the RCRA Facility
Assessment Work Plan Sampling Visit Work Plan,
Group III Solid Waste Management Units
Naval Station Mayport, Jacksonville, Florida

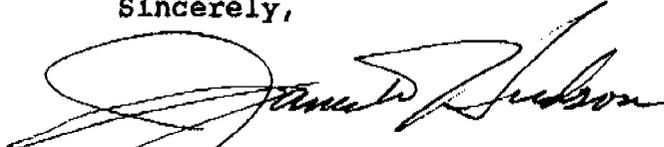
Dear Mr. Davenport:

The U.S. Environmental Protection Agency (EPA), has received and reviewed the Draft Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) Sampling Visit Work Plan, for Group III Solid Waste Management Units (SWMUs) 20, 21, 29, 46 and 52 at Naval Station Mayport (Mayport). EPA's comments are enclosed. The enclosed comments have been divided into specific and general comments. EPA will accept errata sheets to be substituted for pages requiring the necessary new information. Please include an index with the errata sheets which pages are to be substituted. These errata pages are due to EPA by August 23, 1994.

Please note that this letter should be deemed as an unofficial Notice of Technical Inadequacy (NOTI) and that EPA is using this approach in order to expedite approval of documents and to limit the number of official NOTI's your facility receives from EPA.

Should you have any questions regarding these comments, please contact me at the above address or call me at (404) 347-3555, extension 6448.

Sincerely,



James W. Hudson
Remedial Project Manager

cc: Eric Nuzie, FDEP
David Driggers, SOUTHDIVNAVFACENCOM

General Comments

1. The proposed sample locations should be shown on a topographic map. It is not possible to fully evaluate potential contamination pathways without elevations.
2. The text should include the locations of background samples for all media sampled and the parameters to be analyzed. This information is necessary to assess the validity of the background sample locations and to ensure that they are sufficiently upgradient of the source.
3. Section 2.0 of the text indicates that between the time of the 1989 and a site visit in May 1994, large areas of underwent renovation, resulting in areas of new construction. The text also states that large volumes of potentially contaminated soil have been removed from the SWMU 20 and 21 locations as a result of the new construction and that during the construction, some areas were covered with cement. Additionally, the text states that the proposed soil sample locations have been established in order to assess the impact of the past activities at each of the SWMU locations. However, it appears that the proposed soil sample locations have been established only along the perimeter of the source areas and that the source areas are presently covered with cement. Therefore, the proposed sample locations will not adequately assess whether previous soil removal activities have adequately remediated contaminated soil at each SWMU. The proposed sample locations should be located within the area of the previous soil removal activities. The additional sampling activities should include: angle soil borings or borings drilled through the cement in order to collect a sample from beneath the cement.
4. Section 3.0 of the text presents a subsection entitled Sampling and Analysis Plan (SAP) for SWMUs 20, 21 and 52. However, referring to this as a SAP is misleading because the elements presented in these subsections are lacking many items found in a SAP. For example, the text does not include a detailed sampling procedure, decontamination procedures, handling and shipping procedures or the types of sampling containers required.
5. Generally, there are an insufficient number of monitor wells located downgradient of each SWMU. The minimum number of monitor wells an owner/operator should install in a detection monitoring system is one upgradient and three downgradient wells, as per the RCRA TEGD.

Specific Comments

1. Page iii, Executive Summary, Paragraph 2: The text states that the release of contaminants from SWMUs 20, 21 and 56 to environment is suspected but not confirmed. However, SWMU 56 is not included in the Group III Draft RFA Work Plan. This inconsistency should be corrected.
2. Page 1-7, Section 1.2, Paragraph 1: The text states that confirmatory sampling for SWMU 46 is not proposed because releases of petroleum-related contaminants at SWMU 46 have been confined and they are being assessed under the State of Florida underground storage tank regulation. The text should provide specific details on the confining of the contaminants associated with SWMU 46.
3. Page 2-15, Section 2.5, Paragraph 1: The text states that there is a drain in the concrete slab that directs runoff to a nearby oil and water separator at the SWMU 52 location and that it is depicted in Figure 2-4. However, Figure 2-4 does not depict the location of the drain at SWMU 52. The figure should be corrected.
4. Page 2-15, Section 2.5, Paragraph 1: The text states that SWMU 52 is located at Building 25, which is east of the Destroyer Berthing Pier. However, Figure 2-5 depicts the location of Building 25 as being west of the Destroyer Berthing Pier. This inconsistency should be corrected.
5. Page 3-1, Section 3.0, Paragraph 3: The text states that the environmental samples collected will be compared to appropriate background samples. However, the text does not provide the proposed background sample locations.
6. Page D-2, Appendix D: The text lists the specific procedures for the collection of the subsurface soil samples. This section should also include the specific handling and mixing procedures for soil samples listed in Section 4.2.10 of the EPA Region IV ECB SOPQAM.
7. Page D-8, Appendix D: The text lists the specific procedures for the collection of the surface soil samples. This section should also include the specific handling and mixing procedures for soil samples listed in Section 4.2.10 of the EPA Region IV ECB SOPQAM.
8. Page D-17, Appendix D: The text lists the specific procedures for the decontamination of submersible pumps. This section should include specific decontamination procedures listed in Section B.7.2 of the EPA Region IV ECB SOPQAM.
9. Page E-1, Appendix E: The site-specific health and safety plan should also include directions for and map of the emergency route to the hospital.