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LETTER REPORT REGARDING COMPLETION OF INTERIM MEASURE FOR THE
EXCAVATION, TRANSPORTATION AND DISPOSAL OF SOIL CONTAINING PCB AT SOLID
WASTE MANAGEMENT UNIT 2 NS MAYPORT FL
6/2/1997
ABB ENVIRONMENTAL SERVICES



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June 2, 1997

Commanding Officer
South Division
Naval Facilities Engineering Command
2155 Eagle Drive
North Charleston SC 29418

Attn: David Driggers, Code 1852

Dear David:

**SUBJECT: Completion of Interim Measure at SWMU 2 PCB Area
Resource Conservation and Recovery Act
Corrective Action Program
U.S. Naval Station, Mayport, Florida
Contract No. N62467-87-D-0317 CTO#028**

Enclosed please find two copies of the revised correspondence concerning the completion of an interim measure at SWMU 2 PCB Area, U.S. Naval Station, Mayport, Florida. Please replace the attached correspondence with the previous correspondence dated July 26, 1996.

One signed and sealed original and photocopy will be submitted to the U.S. Environmental Protection Agency and Florida Department of Environmental Protection on behalf of Southern Division, Naval Facilities Engineering Command for Naval Station Mayport.

Sincerely,

ABB Environmental Services, Inc.


Terry Hansen, P.G.
Project Manager

enclosure (2 copies)

cc: Cheryl Mitchell, NAVSTA Mayport (two copies)
Martha Berry, USEPA (original and one copy)
Jim Cason, FDEP (original and one copy)
Valerie McCain, Bechtel (one copy)

ABB Environmental Services, Inc.



June 2, 1997

Commanding Officer
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Charleston SC 29418

Attention: Mr. David Driggers (Code 1582)

Dear Mr. Driggers:

**SUBJECT: Completion of Interim Measure at SWMU 2 PCB Area
Resource Conservation and Recovery Act
Corrective Action Program
U.S. Naval Station, Mayport, Florida
Contract No. N62467-87-D-0317 CTO#028**

The interim measure for the excavation, transportation and disposal of soil containing polychlorinated biphenyls (PCBs) at a site associated with Solid Waste Management Unit (SWMU) 2 has been completed and documented. The presence of PCBs at the site was originally documented in an Expanded Site Investigation (ESI) (E.C. Jordan, 1988). PCBs were detected at 2,576,000 micrograms per kilogram ($\mu\text{g}/\text{kg}$) in a soil sample collected at a sampling interval that extended from the land surface to a depth of 2 feet beneath the land surface at the location of a monitoring well located hydraulically downgradient from SWMU 2 (E.C. Jordan, 1988).

Findings from the ESI and investigations conducted for a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) at SWMU 2 and the PCB area are documented in the RFI reports for Group I SWMUs, U.S. Naval Station (NAVSTA) Mayport, Florida, dated November 1992 and March 1996 (ABB Environmental Services, Inc. [ABB-ES], 1992; 1996). These reports were prepared on the behalf of Southern Division Naval Facilities Engineering Command (SOUTHNAVFACENGCOM), North Charleston, South Carolina by ABB-ES. Recommendations for conducting the interim measure were presented in the RFI report for Group I SWMUs prepared in November 1992, and the interim measure was in progress during the preparation of the RFI report prepared in March 1996.

Workplans prepared for SOUTHNAVFACENGCOM to guide the interim measure include:

- Interim Measure Workplan SWMU 2, PCB Area, NAVSTA Mayport, Florida, by ABB-ES, May 1994; and
- Interim Remediation Work Plan for SWMU 2 PCB Area, NAVSTA Mayport, Florida, by Bechtel Environmental, Inc. (Bechtel) June 1995.



The purpose of the interim measure was to eliminate the potential spreading of soil containing PCBs to other areas surrounding or in the vicinity of the site. The objectives proposed for the interim measure are as follows:

- remove PCB-contaminated soil from the area north of SWMU 2 near monitoring well pair MPT-2-MW9S/9D; and
- verify attainment of cleanup criteria through screening and laboratory analysis (ABB-ES, 1994).

A cleanup criteria of 25 parts per million (ppm) (25,000 $\mu\text{g}/\text{kg}$) was originally proposed in the interim measure workplan, but in response to regulatory comments was modified to 1 ppm (1,000 $\mu\text{g}/\text{kg}$) (ABB-ES, 1994). The 1 ppm criterion is the U.S. Environmental Protection Agency (USEPA) starting point guidance value (preliminary remediation goal) for assessing whether or not PCBs are present in soil at concentrations acceptable for unlimited exposure by a residential receptor (USEPA, 1990). Higher starting point values, 10 to 25 ppm, are suggested by USEPA to be applicable for industrial sites (USEPA, 1990).

The Navy's Remedial Action Contractor (RAC), Bechtel, has provided documentation of the excavation, transportation and disposal of the soil containing PCBs in a report entitled "Completion Report of Solid Waste Management Unit 2, Naval Station Mayport, Florida", dated May 1996. Bechtel's report presents the following information:

- mobilizing to and demobilizing from the site;
- clearing and grubbing of the work area;
- excavating of soil containing PCBs;
- documenting the installation of two replacement monitoring wells;
- documenting waste management, transportation and disposal;
- sampling and verification of removal of soil containing PCBs at the site; and
- documenting of problems encountered and their solutions (Bechtel, 1996).

Appendices to Bechtel's report contains photographs documenting their work activities, field screening data, waste manifests, a users guide for the field screening test kits used, laboratory analytical data used to confirm the field test results and schematics of the monitoring wells (MPT-2-MW9S/9D) that were replaced.

Technical oversight of the RAC activities during the interim measure was conducted by ABB-ES. The oversight activities were conducted under the supervision of a professional geologist registered in the State of Florida. A field log book was maintained during the oversight activities, a photocopy of the field log book is provided in Attachment A. Photographs were also taken during the interim measure, photographs depicting various stages of the interim measure are provided in Attachment B.

Based on review of Bechtel's report and the technical oversight activities, the information contained in Bechtel's report appears to accurately portray the interim measure site activities and sufficiently documents that the objectives of the interim measure were met.



No further investigation at this time is recommended for the SWMU 2 PCB site. Review of the analytical data provided in Bechtel's completion report (Bechtel, 1996) suggest that the interim measure meets the objectives stated in the interim measure workplan (ABB-ES, 1994) and USEPA's preliminary remediation goal of 1 ppm for unlimited exposure to PCBs in soil by a residential receptor (USEPA, 1990).

It is assumed that future use of the site, if any, will be industrial, which is compatible with the interim measure. However, should the site be proposed for any development or other use in the future, the documents referenced in this correspondence should be reviewed to assess whether or not the development is compatible with the current site conditions. Information concerning the investigation and interim measure at the SWMU 2 PCB site should be provided to Navy personnel responsible for planning site development.

This correspondence was prepared to describe the oversight activities conducted by ABB-ES and provide an opinion based on work completed by Bechtel (Bechtel, 1996) that the interim measure at the SWMU 2 PCB site meets the interim measure objective (ABB-ES, 1994). If site conditions are determined to exist that differ from those described, the undersigned geologist should be notified to evaluate the effects of any additional information on the interim measure that was conducted at the SWMU 2 PCB site.

If you have any questions, please call me at 904-656-1293.

Very truly yours,

ABB ENVIRONMENTAL SERVICES INC.

Francis K. Lesesne, P.G.
Principal Geologist

Terry J. Hansen, P.G.
Project Manager

Attachments:

- Attachment A Photocopy of field logbook
- Attachment B Photographs
- Attachment C References

cc: Cheryl Mitchell, NAVSTA Mayport



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