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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT INTERIM
MEASURES PERFORMANCE SPECIFICATIONS FOR GROUP 1 SOLID WASTE
MANAGEMENT UNITS 4, 49 AND 50 NS MAYPORT FL
9/22/1997
U S EPA REGION IV

SEP 22 1997

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Mr. David Driggers
Code 1852
SOUTHNAVFACENGCOM
2155 Eagle Dr.
Charleston, S.C. 29418

SUBJ: Naval Station Mayport, Florida
EPA ID# FL9 170 024 260

Dear Mr. Driggers:

EPA has reviewed the following document:

- o Draft Interim Measures Performance Specifications, Group I Solid Waste Management Units 4, 49, 50

and has enclosed its comments with this letter. If you have any questions, please contact me at 404/562-8533.

Sincerely,

Martha Berry
Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: Jim Cason, FDEP
Cheryl Mitchell, Naval Station Mayport
Terry Hansen, ABB Environmental
Frank Lesesne, ABB Environmental
Valerie McCain, Bechtel

**U.S. NAVAL STATION
MAYPORT, FLORIDA
EPA I.D. NO. FL9170024269
INTERIM MEASURES PERFORMANCE SPECIFICATIONS
RFI GROUP I SWMUS 4, 49, AND 50**

REVIEW COMMENTS

Section 2.1, Rationale for Sampling Conducted At SWMU 4, page 2-2

1. It is unclear why surface sediment (1 to 2 foot depth) sampling was performed at MPT-4-SD02. All other sampling locations for the IM Performance Specification Report include sampling at the 0 to 1 foot depth.

Section 3.1.1, Surface Water Analytical Results (SWMU 49), pages 3-1 through 3-5

2. The data in Tables 3-2 and 3-3 do not correlate. Specific discrepancies are noted below:
 - Table 3-3 indicates that antimony was detected in 3 of 10 samples, but Table 3-2 only identifies antimony in 2 samples;
 - Table 3-3 indicates that the highest detection of arsenic was 6.8 ug/L, whereas Table 3-2 indicates that the highest detection is 14 ug/L;
 - Table 3-3 indicates that arsenic was detected in 4 of 10 samples; however, Table 3-2 identifies arsenic in 5 samples; and
 - Table 3-3 indicates that the highest detection of antimony was 14 ug/L, whereas Table 3-2 indicates that 2.6 ug/L was the highest detection.

Please resolve these discrepancies, and indicate whether the corrections change the conclusions of Section 3.1.1.

3. The USEPA surface water chronic screening criteria that are hardness dependent have been calculated to be site-specific, as presented in Appendix D of the IM Performance Specification Report. The calculations, however, are incorrect and have been biased low. As indicated in 40 CFR 131.36(b)(2), the equations to calculate hardness dependent metals criteria require an acute or chronic conversion factor. These conversion factors have been left off the equations presented in Appendix D. Please revise Appendix D and Table 3-3 to correct these errors, and revise the conclusions of Section 3.1.1 as necessary.

Section 3.1.2, Sediment Analytical Results, pages 3-3 through 3-23

4. The text on page 3-3 should be revised to indicate that two additional SVOCs bis(2-ethylhexyl)phthalate, and pyrene were also detected at levels that exceed ecological screening criteria, as shown in Table 3-5.

5. The text on page 3-3 should be revised to indicate that an additional pesticide 4,4-DDE was also detected at levels that exceed ecological screening criteria, as shown in Table 3-5.
6. The text on page 3-23 should be revised to indicate that zinc sample results also exceeded ecological screening criteria, as shown in Table 3-5.
7. The text on page 3-23 should be revised to indicate that antimony, arsenic, copper, lead, mercury, and nickel were also detected above ecological sediment screening criteria.
8. It is unclear why all of detected constituents listed in Table 3-5 are not included in the summary Table 3-6. Other constituents detected in MPT-49-SD18 through MPT-49-SD21 include barium, chromium, mercury, selenium, zinc, pyrene, indeno(1,2,3-cd)pyrene, and toluene. Please explain why these additional constituents are missing.
9. The data in Tables 3-5 and 3-6 do not correlate. Table 3-5 indicates that bis(2-ethylhexyl)phthalate was detected in MPT-49-SD18, but this information is missing in the data summary, Table 3-6.

Section 3.2.1, Surface Water Analytical Results (SWMU 50), pages 3-23 through 3-29

10. As indicated in 40 CFR 131.36(b)(2), the equations to calculate hardness dependent metals criteria require an acute or chronic conversion factor. These conversion factors have been left off the equations presented in Appendix D. As a result, the criteria reported in Table 3-9 are biased low. Please revise Appendix D and Table 3-9 to correct these errors, and revise the conclusions of Section 3.2.1 as necessary.

Section 3.3.1, Surface Water Analytical Results (SWMU 4), pages 3-35 through 3-51

11. As indicated in 40 CFR 131.36(b)(2), the equations to calculate hardness dependent metals criteria require an acute or chronic conversion factor. These conversion factors have been left off the equations presented in Appendix D. As a result, the criteria reported in Table 3-15 are biased low. Please revise Appendix D and Table 3-15 to correct these errors, and revise the conclusions of Section 3.1.1 as necessary.

Section 4.1, SWMU 49, Flight Line Retention Ponds, pages 4-1 and 4-2

12. Page 4-2 states that the results of the biological survival testing indicate that the contaminants found at SWMU 49 are not expected to impair reproduction, growth, or survival of benthic and aquatic receptors. Since the biological tests are acute tests meant only to demonstrate survival, it is unclear how conclusions related to reproduction and growth have been reached. Please provide clarification of this issue.

Section 4.2, SWMU 50, pages 4-3 through 4-7

13. Page 4-6 states that different test population numbers were used for site samples versus control samples and suggests that population size is responsible for the differential survival rates. The biological testing report in Appendix E does not clearly indicate that different population sizes were used. In fact, the report states there were no deviations from the testing methodology (attached to the report in Appendix E) that calls for equal population sizes to be used for control and site sample testing. Please provide a more detailed discussion on this issue, clearly indicating where different sample population size information is provided in Appendix E. Also, please explain why the biological testing laboratory used inconsistent test population sizes.

Section 5.2, SWMU 50, page 5-3

14. The fourth paragraph on this page states that comparison of analytical results with regulatory screening criteria suggests that surface water contained in SWMU 49 does not impair or prevent reproduction, growth and survival of terrestrial and aquatic receptors. A similar statement is found in the third paragraph on page 5-4. Since the discussions in Section 5.2 pertain to SWMU 50, it appears that the references to SWMU 49 are incorrect. The text should be revised to correct this error.