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NS MAYPORT
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EMAIL DISCUSSING APPROVAL FOR REMEDIAL ACTION ALTERNATIVES WAIVER FOR SOLID WASTE MANAGEMENT UNITS 8, 9, 11 AND 51 (SWMU 8, 9, 11 AND 51) NS MAYPORT FL
1/9/2013
NAVFAC SOUTHERN

Claggett, Libby

From: Fears, Diane
Sent: Thursday, August 07, 2014 9:30 AM
To: Claggett, Libby
Subject: FW: Request for RAA waiver for four SWMUs at NAVSTA Mayport

Importance: High

RAA Waiver approval for SWMUs 8, 9, 11, and 51 _____
From: Hayworth, Dana CIV NAVFAC SE [dana.hayworth@navy.mil]
Sent: Wednesday, January 09, 2013 06:47
To: Fears, Diane
Cc: Roof, Gregory; Reed, Sarah M CIV NAVFAC SE, JAX
Subject: FW: Request for RAA waiver for four SWMUs at NAVSTA Mayport

Diane/Greg:

See Tom's email below. We are good to go.

Thanks,

Dana Hayworth, P.G.
Remedial Project Manager
NAVFAC SE Atlantic IPT
NAS Jacksonville, Bldg 135
P.O. Box 30
Jacksonville, Fl 32212
Voice (904) 542-6417
Fax (904) 542-0289
Cell (904) 755-7604

-----Original Message-----
From: Spriggs, Thomas A CIV NAVFAC LANT, EV
Sent: Tuesday, January 08, 2013 16:24
To: Hayworth, Dana CIV NAVFAC SE
Subject: RE: Request for RAA waiver for four SWMUs at NAVSTA Mayport

Dana,

After reviewing these figures and reading the text provided, I agree and grant these four SWMUs each with a RAA waiver. Should site conditions change or additional contaminants appear, please contact me and we'll need to develop RAAs. As always, please don't hesitate to contact me should you need additional technical support.

Good luck as you continue to close out sites at Mayport!
Tom

-----Original Message-----
From: Hayworth, Dana CIV NAVFAC SE
Sent: Monday, January 07, 2013 13:16

To: Spriggs, Thomas A CIV NAVFAC LANT, EV
Subject: FW: Request for RAA waiver for four SWMUs at NAVSTA Mayport

Tom

Per our conversation, look over and comment for any further info.

Thanks,

Dana Hayworth, P.G.
Remedial Project Manager
NAVFAC SE Atlantic IPT
NAS Jacksonville, Bldg 135
P.O. Box 30
Jacksonville, Fl 32212
Voice (904) 542-6417
Fax (904) 542-0289
Cell (904) 755-7604

-----Original Message-----
From: Fears, Diane [mailto:Diane.Fears@tetratech.com]
Sent: Monday, January 07, 2013 12:54
To: Hayworth, Dana CIV NAVFAC SE
Cc: Roof, Gregory
Subject: Request for RAA waiver for four SWMUs at NAVSTA Mayport

Dana,

To keep from spending hours (and money we don't have) to put together RAAs for the sites at Mayport, Mike Maughon suggested we request waivers from the RAA requirement. He helped me draft this email, which you can send to Tom Spriggs, copy to Mike Maughon, requesting the waivers.

Let me know if you have any questions.
thanks

Diane

TetraTech is working an a CMS for four sites: SWMUs 8, 9, 11 and 51. The four sites each have low concentration, fuel-related contamination, and are located adjacent to or in the same vicinity of each other in an industrial area containing a fuel farm and related facilities. (See Selected SWMU Location Map, Figure 1.) LUCs are already in-place at adjacent SWMUs 6 and 7. The RFI was completed for these sites in 1996. The RFI Addendum was completed in 2012. In accordance with the NAVFAC RAA Guidance, each of these sites is likely eligible for an RAA waiver because the CMS for each site will only include two alternatives, No Action and Land Use Controls. Additional supporting information for each site is provided below.

SWMU 8 is the percolation pond for SWMU 9, which is the Oily Waste Treatment Plant (OWTP). SWMU 8 was used from 1979 to 1994, when it was removed from service. After sampling the surface soil, subsurface soil, and groundwater, the only impact is one monitoring well with elevated iron (11,100 µg/L). The well is upgradient from SWMU 8, and downgradient wells do not exceed the Florida groundwater criteria target levels (GCTLs) promulgated in Chapter 62-777 Florida Administrative Code (F.A.C.). Since the groundwater is classified as G-III (non-potable use) due to the total dissolved solids greater than 10,000, and this level does exceed the Poor Quality GCTL (ten times the drinking water GCTL), no treatment other than institutional controls would be considered for this elevated constituent.

SWMU 9 is the OWTP. One surface soil sample exceeds benzo(a)pyrene (BAP) and BAP equivalents. Four subsurface soil samples exceed for BAP, BAP equivalents and polycyclic aromatic hydrocarbons (PAH) at 9 ft below land surface (bls). One monitoring well exceeds the drinking water GCTL for iron, but does not exceed the Poor Quality GCTL. The groundwater is G-III (non-potable). The area of the OWTP is rife with piping, and an excavation would be ineffective due to the utility and piping interferences. There is not a particular plume, as noted in the attached figure 3-2, and LUC would be the most effective way to manage the risk.

SWMU 11 was identified as a fuel spill area in the Initial Assessment Study conducted in 1986 and is located in the NAVSTA Mayport Fuel Farm. The Fuel Farm was completely renovated in 2001, and the truck fill stand is now located adjacent to the area identified as SWMU 11. Four subsurface soil samples exceed soil CTLs (SCTLs) for residential and industrial criteria for total petroleum hydrocarbons (TPH), as shown in the attached figure 3-3. The depth of the contamination is 13 ft bls. Groundwater is not impacted. Excavation is difficult and probably ineffective due to the underground piping and utilities, and LUCs are the most effective method of risk management.

SWMU 51 is a trio of Waste Oil Tanks, cut and cover tanks which were constructed in 1954. They were also used as the oily wastewater receiving tanks for SWMU 9, the OWTP. SWMU 51 is located in the NAVSTA Mayport Fuel Farm. The tanks were removed with the renovation in 2001, and the area was configured into a truck parking area. One surface soil sample exceeds the residential and leachability SCTL for TPH, and 8 subsurface soil samples exceed SCTLs for PAH, BAP, BAP equivalents, and TPH at depths of 11 to 13 ft bls, as shown in Figure 3-4. This is an active fuel farm, with piping and utilities making soil excavation ineffective. The groundwater also has impacts, as shown in Figure 3-8. This area is downgradient, and adjacent to, SWMUs 6 and 7, which are the oily waste sludge drying beds that have LUCs for both soil and groundwater. The groundwater in this area is G-III (non-potable), is being monitored for petroleum constitutents, and the impacts at SWMU 51 are associated with SWMUs 6 and 7. This is another site where LUCs are the most effective method of risk management.

We believe that it wouldn't be in the Navy's best interest to do an RAA for each of these sites due to the simplicity of the contamination, the existing LUC in the vicinity, the agreement of the IR Partnering Team to do LUCs for these sites, and the ineffectiveness of any treatment strategy.