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NS MAYPORT
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING WORK PLAN, QUALITY CONTROL PLAN AND HEALTH AND
SAFETY PLAN FOR SOLID WASTE MANAGEMENT UNITS 6 AND 7 NS MAYPORT FL

6/27/1995

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0097

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

June 27, 1995

Ms. Elaine M. Morrison, P.E.
Department of the Navy
Southern Division Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 190010
North Charleston, South Carolina 29419-9010

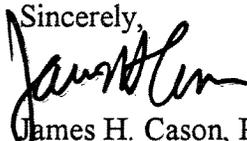
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SUBJECT: Review of Work Plan, Quality Control Plan and Health & Safety Plan Submittals for N62476-64-R-0889; Southwest Soil Remediation Inc.; SWMU 6 & 7, Naval Station, Mayport Florida (NELP Program)

Dear Ms. Morrison:

Mr. Greg Brown, P.E., and I have reviewed the subject documents dated June 7, 1995 (received June 14, 1995). I have discussed the memorandum from Mr. Brown with the Mayport Partnering Team last week (June 21-23, 1995). Mr. Brown's comments are attached. Notable in his comments on the document are the inability to identify the area of soil to be treated and the apparent variation from the previous submission of the proposed volume of soil to be treated. Mr. Brown also noted a number of oversight elements in his memorandum. These are important elements of the project that the Navy should address in addition to clearly delineating project responsibility. Finally, because this is an engineering document that is intended to be placed in the public record, it should be signed and sealed by a Florida Registered Professional Engineer as specified in Chapter 471.025, Florida Statutes.

The Navy should adequately address the comments of Mr. Brown and myself before this document can be considered final. If you have questions or require further clarification, please feel free to contact Mr. Brown or myself.

Sincerely,

James H. Cason, P.G.
Remedial Project Manager

Ms. Elaine Morrison

June 27, 1995

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cc: Cheryl Mitchell, NAVSTA Mayport
Jay Bassett, EPA Region IV, Atlanta
John Mitchell, FDEP Natural Resource Trustee
Satish Kastury, FDEP, Tallahassee
Ashwin Patel, FDEP Northeast District, Jacksonville
Jerry Young, City of Jacksonville

TJB JJC ~~ESN~~ ESN ESN

JPC
for
TJB

Memorandum

Florida Department of Environmental Protection

TO: Jim Cason, P.G., Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section *g*

FROM: Greg Brown, P.E., Professional Engineer II, *AB*
Technical Review Section

DATE: June 19, 1995

SUBJECT: Work Plan, Quality Control Plan and Health & Safety Plan Submittals for N62476-64-R-0889; Southwest Soil Remediation, Inc.; SWMU 6 & 7, Naval Station Mayport, Florida.

I reviewed the subject document dated June 7, 1995 (received June 14, 1995). For the record, I will repeat the general comments communicated to the Navy in my letter dated January 13, 1995. These general comments have not been adequately or explicitly addressed by the Navy to date. I will then present my concerns in light of the Navy's present work plan submittals.

GENERAL COMMENTS

- The Navy needs to assure beyond a reasonable doubt that the demonstrations will be "fail safe" and will not increase risks to human welfare or the environment at NS Mayport.
- The demonstration projects are for assessment of technology feasibility only. They will not be used to justify SWMU "closure".
- The Navy must institutionally frame the demonstrations at the permitted SWMUs within the context of the HSWA permit. HSWA related details are EPA's responsibility, but the Department expects consistency with the HSWA permit and with RCRA in general.

The mobile LTTD should comply with Chapter 62-775, F.A.C. when treating petroleum contaminated soils. In addition, the soil contamination must be predominantly petroleum-related substances. I'm including a Department memorandum that provides guidance if low levels of other substances are observed in the soils. Early communication is recommended to discuss permit requirements and waste management issues with the FDEP Northeast Florida District.

The earlier proposal submitted to the Department on November 30, 1994 indicated that an upper limit of about 75,000 tons of petroleum contaminated soil would potentially be treated. This current proposal limits the scope to an upper limit of 3,500

MEMORANDUM

Jim Cason, P.G.

June 16, 1995

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tons. The Navy should confirm this change in scope and also identify the location of the soil to be treated, i.e., Area 3. It is not obvious in the current submittal. The QA Plan discusses collection of samples of excavated and treated soils, but does not address confirmatory sampling of the area being remediated. Any sampling and analysis of soil to confirm attainment of cleanup criteria (treated and in-situ soils) should be conducted using a Department approved Comprehensive QAP or a site-specific USEPA Region IV approved QAPP.

There are significant treatment oversight elements that are critical to the safe and effective completion of the technology demonstration. These include, but are not limited to:

- soil characterization prior to treatment to determine the applicability of the waste for the treatment technology;
- soil management during excavation, stockpiling, treatment, and backfilling to prevent cross contamination of clean media (including stormwater management);
- treatment process monitoring;
- emissions monitoring
- excavated area confirmatory sampling;
- treated soil contaminant levels; and
- certification of achievement of clean soil criteria.

The work plan alludes to a distribution of responsibilities between the treatment contractor, the Navy, and a "designated consultant". This distribution of responsibilities should be made explicit by the Navy. This is necessary to insure that the various key treatment oversight elements are properly addressed by entities with authority to take corrective actions if necessary.

I recommend that the demonstration be conducted once the Navy adequately addresses the comments described above and obtains all required permits. Since this is a RCRA SWMU undergoing corrective measures under a HSWA permit, the Navy should recognize that it will be liable for any unpermitted releases of hazardous substances to the environment as a result of this technology demonstration.

Enclosure (1)

