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NS MAYPORT
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MEMORANDUM AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING HUMAN HEALTH RISK ASSESSMENT FOR SOLID WASTE
MANAGEMENT UNITS 6, 7, 8, 9, 10, 11, 12, 15 AND 16 NS MAYPORT FL
7/21/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Department of Environmental Protection

Memorandum

TO: Jim Cason, DOD Facilities, Technical Review Section, BWC

THROUGH: Jim Crane, Technical Review Section, BWC *JJC*

FROM: *Ligia Mota* Applegate, BWC

DATE: July 21, 1995

SUBJECT: **Human Health Risk Assessment for SWMUs 6, 7, 8, 10, 11, 12, 15 and 16
Mayport Naval Station
Duval County, Florida**

I have reviewed the subject document prepared by ABB, and have the following comments for your consideration:

1.0 Dilution to meet the surface water standards is not allowed for this type of discharges (contaminated groundwater potentially seeping into surface water). The surface water standards and minimum criteria must be met prior to mixing. This comment applies to all SWMUs.

2.0 Toxicity bioassays to determine compliance with Rule 62-302.530(62), F.A.C., is needed in wells adjacent to surface water. A memorandum from Dr. Landon Ross that identifies test methods is attached.

3.0 The FDEP acceptable risk level is 1.0E-06.

4.0 Averaging to determine groundwater concentrations for use in risk assessments is not typically acceptable. The maximum concentration of each chemical should be used unless there is a site specific circumstance that warrants a different approach, in which case the rationale should be thoroughly discussed and justified.

5.0 Usually, in G-II aquifers the minimum criteria and the primary and secondary standards apply for all the contaminants of concern. In cases of salt water intrusion, the standards that would apply as cleanup goals are the marine surface water standards and minimum criteria if indeed the only receptors of concern are the aquatic organisms. The PRPs must file a deed restriction/well moratorium for all groundwater use. A letter from the appropriate water authority agreeing to not permit any ground water use at this site is also required by the Department.

MEMORANDUM

ADDRESSEE

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SWMU 6-11 (OWTP Area)

The document states that the Navy plans to remediate the sludge lagoons at the OWTP Area. In addition, subsurface soil will need to be evaluated and remediated (if warranted) in conjunction with free product removal pursuant to Chapter 62-770, F.A.C., as discussed that it will be done/proposed on the CMS. Unless these tasks are accomplished, this portion of the Risk Assessment will be rendered invalid.

SWMU 12

Soil assessment is needed to determine the horizontal and vertical extent of contamination and the need for cleanup of the area where the sodium hydroxide spill occurred.

SWMU 15

RGOs that correspond to the $1.0E-06$ risk level in Tables 6-21 and 6-22 are acceptable. The Florida cleanup goals obviously are also acceptable. If an industrial scenario is chosen, a deed restriction for residential land use will be needed.

Attachments

/lm-a