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NS MAYPORT
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY ASSESSMENT SAMPLING VISIT WORK PLAN FOR GROUP 4 SOLID WASTE
MANAGEMENT UNITS 47, 53, 54 AND 55 AND AREAS OF CONCERN A A

8/15/1995

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0101

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

Virginia B. Wetherell
Secretary

August 15, 1995

Mr. David Driggers
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 190010
North Charleston, SC 29419-9010

file: GpIV_wp.doc

RE: Draft RFA/SV Workplan for Group IV SWMUs 47, 53, 54 and 55 and Areas of Concern A and B, NAVSTA Mayport

Dear David:

I have reviewed the above document dated May 1995 (received May 15, 1995) and offer the following comments. Please address these comments in the final draft.

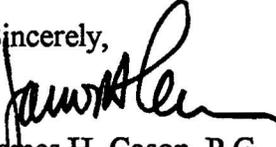
1. Figure 1-2: place a notation on the map that the Group IV SWMUs are dispersed around Mayport Naval Station.
- ✓ 2. Figure 2-1 needs to better emphasize and differentiate the Solid Waste Management System (it is not evident in the figure) and the Oily Waste Collection System; please emphasize and label the OWTP and provide appropriate legend references. Future reports should also indicate the force mains, gravity and force sections, lift stations, etc., all to the greatest extent possible consistent with clarity; larger scale figures may be in order).
3. Section 2.1.1: a short discussion of the "regular intervals" for testing the force lines should be included. Will soil borings be taken at the lift stations, where overflows would ✓ be expected to occur?
4. Section 2.1.2.3: I assume that the reason that screened intervals can be placed into the water table is that a portion of them will remain above and afford gaseous sampling. If ✓ this is the case, a short statement in this regard in the work plan would suffice. This comment also applies to Section 2.2.2.2, page 2-16.
5. Section 2.1.2.4: in the discussion of the number of gas samples, the number of 480 is utilized. Will this many samples be taken? If not, how many will be taken and how will ✓ their location be chosen?

- ✓ 6. Page 2-13: in paragraph 3, were the repairs that were recommended for the lines accomplished? Will these areas receive any sampling bias? Will defects noted in Section 2.2.2.1 be correlated with the mentioned repairs?
- ✓ 7. Section 2.2.2.3: will the full 340 sample points be utilized?
8. Page 2-19: why will SVOCs not be analyzed in the soil/water samples?
- ✓ 9. Page 2-22: please confirm that the management of the oil/water separators under Chapter 62-761 has, or is capable of and will, assess past releases from the oil/water separators that occurred prior to being transferred to that program.
10. Figure 2-2 and Figure 2-3 are duplicates; they should be combined and perhaps renamed "Location of Industrialized Areas Containing SWMU 53-Sanitary Sewers and SWMU 54-Storm Sewers."
11. Figure 2-5 needs emphasis and a legend.
- ✓ 12. Page 2-27: same comment as 9, above, with respect to the assessment of releases prior to pre-Chapter 62-761, F.A.C. status.
- ✓ 13. Page 2-28: RAP status; does the last paragraph belong in this document (is this the place for a recommendation)?
- ✓ 14. Page 3-11: regarding trip blanks, does "each shipment" mean each shipping container?
- ✓ 15. Section 4.0: will preliminary risk screening be conducted at all Group IV SWMUs and AOCs, including those being managed under Chapter 62-761, F.A.C.?
- ✓ 16. Page 4-1: use the newer soil cleanup goals in the April 5th, 1995 FDEP memorandum *Soil Cleanup Goals for the Military Sites*.
17. Page 4-2: sediment analyses should be screened by reference to *Approach to the Assessment of Sediment Quality in Florida Coastal Waters*, MacDonald Environmental Sciences Ltd., November 1994.
18. Page 4-2: it is stated that guidance concentrations for promulgated Florida ground water guidance concentrations will be identified in the text. Will the non-promulgated values be ignored? Will they be considered?
- ✓ 19. Reference list: correct for Soil Cleanup Goals and MacDonald, 1994.

Mr. David Driggers
August 15, 1995
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Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-9994

Sincerely,


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

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

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