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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 INVESTIGATION FOR GROUP 2 SOLID WASTE MANAGEMENT UNITS NS
MAYPORT FL
8/16/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

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

Naval Station Mayport
Administrative Record
09.01.00.0102

Virginia B. Wetherell
Secretary

August 16, 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: rfi_gpII.doc

RE: Draft RCRA Facility Investigation Report for Group II SWMUs, NAVSTA Mayport,
June 1995

Dear David:

I have reviewed the above document dated June 1995 (received June 8, 1995) and offer the following comments. The document is generally well done; however, the following comments need to be adequately addressed in the final draft.

1. References to Florida soil cleanup guidance should be to the FDEP memorandum *Soil Cleanup Goals for the Military Sites, April 1995*. This reference is used in the text but is missing in the bibliography.
2. Section 2.2.4: please document the disposition of the soils removed from SWMU 16, including their testing before and after removal; to confirm their non-regulatory nature. See comment 10, below.
3. Please document the successful installation and removal of monitoring wells MPT- 8-MW19S and MPT-8-MW20S in the shallow water of the St. Johns River. Their locations, as shown in Figure 3-1 and 3-2, is confusing without an explanation.
4. In Table 4-3, Summary of Compounds Detected in Oily Waste Treatment Plant, the Florida guidance concentrations that are referenced are for ground water; this should be duly noted and the reason for their use given in the footnotes.
5. The approximate location of the sodium hydroxide spill should be noted on Figure 5-1. This area should also be considered for an AOC, irrespective of the current SWMU status of the area.
6. Section 6.0, SWMU 15: because of the type of contamination distribution (assumed random surface disposal), the use of a statistical sampling regime, if utilized to assure proper "hot spot" assessment, should be discussed as was done for SWMU 16.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

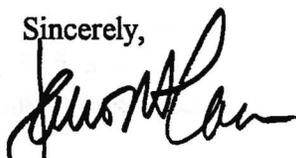
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7. Recommendations for SWMU 6,7,8,9,10 and 11 (OWTP area): I agree with the recommendation to conduct a CMS for free-phase hydrocarbons at these SWMUs. The statement that SWMU 7 is undergoing remediation under the NELP program is not quite correct. The NELP program will evaluate one technology which may be utilized in the remediation of the SWMU.
8. Recommendation for SWMU 12: I agree that this SWMU does not require further investigation as it relates to SWMU designation; however my comment (5) above, should be considered as this is pursued. I note also that all questions regarding the equivalency demonstration have not been completely answered, and while I don't expect serious problems, this may have a bearing on this recommendation.
9. Recommendations for SWMU 15: I agree with the recommendation to conduct a CMS on this SWMU. It should also be noted that this SWMU is also being investigated under the NELP program as a possible candidate for bioremediation.
10. Recommendations for SWMU 16: I agree that the SWMU does not require further investigation at this time; however, documentation of the removal, testing and disposition of the soil should be added to the RFI.

Department staff have reviewed the Human Health and Ecological Risk aspects of the document. Their comments are attached and should also be considered in the final draft. 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

Attachments (2)

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

TJB B JJC JE ESN _____