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NS MAYPORT
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT CORRECTIVE MEASURES STUDY FOR GROUP 2
SOLID WASTE MANAGEMENT UNIT NS MAYPORT FL
10/16/1995
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
09.01.00.0108

Virginia B. Wetherell
Secretary

October 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

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RE: Review of draft Corrective Measures Study, Group II SWMUs, Naval Station Mayport

Dear David:

Greg Brown, P.E., and I have reviewed the above document. Please address our comments, and as suggested in Greg's memo, when adequate responses are received by both EPA Region IV and the Department, we can attach the responses to the draft document, attach the green final cover and the engineering certification and the document will be finalized.

1. Evaluation of any potential ground water threat from SWMU 15 to the shallow ground water in Mayport should be a priority item for the Navy, as we have previously discussed.
2. When on-site Thermal Desorption occurs at SWMU 6 & 7, stormwater protection measures, such as berming, must be used. When these activities are accomplished, only clean soils or treated soils from the area that have been certified by testing as meeting clean soil criteria may be used for this purpose.
3. As pointed out in Mr. Brown's second comment, the stated Department policy regarding contaminated ground water as it discharges into surface water is that a dilution factor may not be applied in the evaluation of potential effects. This has been noted in other Mayport documents, and has been previously stated, the ground water must be evaluated based on its non-diluted nature.

Mr. David Driggers
October 19, 1995
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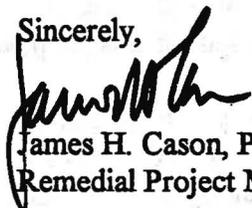
important that the Navy recognize that it and others must be able to relate the data produced by the demonstration to appropriate regulatory requirements. Additionally, since this is a designated RCRA SWMU, it is recommended that adequate records of all aspects of the demonstration be maintained.

General Procedure - Bioremediation of Hydrocarbon Contamination of Concrete Surfaces

1. In the purpose, it is stated that the goal is to remediate until "the rain water runoff registers a Total Petroleum Hydrocarbon (TPH) parts per million level below the established acceptable limit." As I have stated on several occasions and in my letter of April 24, 1995, this may be confusing since there is no established surface water standard for TPH in Florida; we do have a standard for "dissolved or emulsified oil or greases" of 5 mg/L. The cleanup goal, as stated, is therefore not achievable and should be reconsidered.
2. Section 1.0, Testing: the statements that "after the bioremediation process appears complete" and "target TPH has been met" are quite vague, especially in light of my previous comment. How will the goal of remediation be judged? How will the Navy assess the success (or failure) of the demonstration?
3. Section 3.5.1, NOTE: the recycled bioremediation product may be used in soil applications only if it meets established ground water standards.
4. As previously stated, no formal sections on Results and Conclusions are listed. Unless the Navy intends to make these determinations, I suggest that this be made a part of Section 5.0 as noted in comment 3, previous section.

If you have questions, need additional copies of appropriate rules 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
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