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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING LETTER REPORT FOR SEDIMENT AND SURFACE WATER
SAMPLING AND ANALYSIS RESULTS NS MAYPORT FL
1/12/1996
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0117

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

Virginia B. Wetherell
Secretary

January 12, 1996

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: Letter Report - Sediment and Surface Water Sampling and Analysis Results - Lake
Wonderwood Area U.S. Naval Station Mayport

Dear David:

I have reviewed the named letter report dated September 8, 1995 (received
September 18, 1995) and offer the following comments which should be
addressed:

1. In a letter dated October 19, 1995 to Mr. Joseph Franzmathes, Region IV EPA, M.J. McVann, Acting Staff Civil Engineer, stated that this area was an Area of Concern. I recognize that this letter was written after this report; however, please clarify the status of this area.
2. The stated purpose of the sampling and analysis event was to describe methods that will be used to assess possible releases (which was accomplished) and not to assess the nature and extent of contamination. The recommendation was, however, "no further investigation at this time" and no mention is made of the method assessment. This should be accomplished. Additionally, the first "bullet" describes DBCP as the "primary target analyte" for this assessment; while this may be true, and I have no argument with it, this should be better stated in the introduction.
3. Lake Wonderwood is an artificial water body and is relatively young; however, no physical description was furnished for the sediment samples. Without diverging into possible sedimentation rates, is it possible that the sediment samples are being "diluted" if the one foot core sample includes a significant amount of non-lacustrine (pre-lake) sediment? Should we consider taking shorter core samples?
4. On Figure 2, should the direction of drainage of the golf course (to Lake Wonderwood) be indicated?

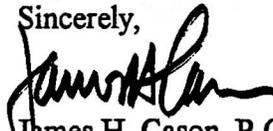
"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. David Driggers
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5. Table 5 utilizes two number "6" superscripts; the one for Class III Marine Surface Water Standards should be changed and the reference for the Standards added to the notes at the end of the table and in the reference list.
6. In the recommendations, it was stated that TEL benchmarks in the sediments were exceeded at a low frequency of occurrence. It appears that 4,4-DDE and 4,4-DDT exceeded the MacDonald TEL value in all cases in which they were detected. The TEL numbers are useful in helping pinpoint areas that we may need to examine more closely. I suggest that the Navy revisit the data in this report with the thought in mind of evaluating the ecological impact of these materials and any possible human health aspects since the lake is utilized for sportsfishing. We may want to consider a representative tissue sampling program which considers the human fishing activities and the foraging characteristics of any threatened and endangered species that may utilize Lake Wonderwood.

Thank you for the opportunity to review these data and the report. 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
Martha Berry, EPA Region IV, Atlanta
Pat Kingcade, OGC, FDEP Tallahassee
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