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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING IMPLEMENTATION PLAN NAVY ENVIRONMENTAL LEADERSHIP PROGRAM TECHNOLOGY DEMONSTRATION OF THERMAL DESORPTION OF SLUDGE AND SOIL AT SOLID WASTE MANAGEMENT UNITS 6 AND 7 NS MAYPOR
2/7/1996
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA

Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0118

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 7, 1996

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

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RE: Review of Implementation Plan NELP Technical Demonstration for Low Temperature Thermal Desorption of Sludge and Soil at SWMU 6 & 7, NAVSTA Mayport

Dear David:

I have reviewed the above draft Implementation Plan dated October 1995 (received October 16, 1995). I have previously furnished comments on the demonstration contractor (Southwest Soil Remediation Inc.) workplan in a letter to Mr. Harold McGill dated December 20, 1995 and am presently reviewing the final draft Workplan by the contractor. As I have previously noted, this demonstration is being conducted by the contractor under Department permit for the facility and will achieve treatment pursuant to Chapter 62-775, F.A.C. By having ABB Environmental Services provide technical oversight for the project, collecting samples consistent with operating procedures in the NAVSTA Mayport RFI Workplan, documenting the overall progress of the project, and in the preparation of a summary report, the Navy will be in a better position to properly evaluate the efficiency of this method of treatment. The following minor comments are offered for your consideration:

1. The contractor (SSR) will be obtaining pre and post-treatment samples; I suggest that the results of these samples be incorporated (or at least included as an addendum) in the final report.

2. Documentation of direct costs associated with the technology demonstration are also suggested for inclusion in the final report in order to help the Navy evaluate not only the technical aspects but the financial aspects as well.

3. This demonstration will occur within a named SWMU. Adequate documentation of the description, location, geometry and volume of material treated and backfilled should be obtained during the course of the demonstration and included in the report.

4. Since this is a demonstration project, the Navy should consider including limited photographic documentation as a part of the project and within the body of the report.

Thank you for the opportunity to comment on the Implementation Plan. I look forward to the technology demonstration. 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 Trustee File, Tallahassee
Terry Hansen, ABB Environmental Services, Tallahassee
Satish Kastury, FDEP, Tallahassee
Brian Cheary, FDEP Northeast District, Jacksonville

TB B JJC JJC ESN JJC

Florida Department of

Memorandum **Environmental Protection**

TO: Jim Cason, P.G., Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section

FROM: Greg Brown, P.E., Professional Engineer II, Technical Review Section

DATE: February 13, 1996

SUBJECT: Final Draft, Southwest soil Remediation, Inc., NELP Technology Demonstration for Low Temperature Thermal Desorption at SWMU 6 & 7; Naval Station Mayport, Florida.

I reviewed the subject document (received February 6, 1996). It is adequate for its intent as qualified by your review comments. Cecil Field NAS is using similar technology on a larger scale to remediate both CERCLA and UST sites. They initially used an open, lined, and bermed area to stage treated soils waiting verification sampling and analysis. Stormwater came into contact with the treated soil and accumulated inside the bermed area. Since it was unknown if the treated soil achieved cleanup standards, the Navy chose to manage the stormwater as wastewater. This soon became impractical due to the volume of stormwater generated. To solve this problem, the Navy has removed the berms (retaining the liner) to prevent stormwater accumulation, and they are shielding the treated soil from stormwater with impervious covers pending analytical results. The Mayport team may wish to consider a similar strategy at SWMU 6 & 7 using the "lessons learned" at Cecil Field.