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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL CORRECTIVE MEASURES STUDY FOR GROUP 2
SOLID WASTE MANAGEMENT UNITS NS MAYPORT FL
5/15/1996
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0122

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 15, 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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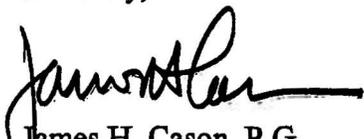
RE: Final Corrective Measures Study for Group II Solid Waste Management
Units, NAVSTA Mayport

Dear David:

Mr. Greg Brown, P.E., and I have reviewed the above document dated January 1996 (received January 18, 1996). Mr. Brown's comments are attached. Both Greg and I are concerned that the CMS does not adequately address ground water contamination at SWMUs 6 and 7. I recognize that a proposed IM consisting of treatment by low temperature thermal desorption of the excessively contaminated soils at the site is presently under review and that the LNAPL removal facility at the site has been in operation since late last year; however, the CMS should more fully address the ground water situation. Since the current LNAPL removal project that is presently underway may take several years to complete, I am concerned that the issue of contaminated ground water has not received the attention it warrants given the close proximity of the St. Johns River. I know that the ground water situation may change as the two present Intermediate Measures proceed to completion; however, ground water data from monitoring well sampling and DPT screening data are presently available in the Group II RFI, presently under review. Please address the ground water contamination at SWMUs 6 and 7.

Thank you for the opportunity to review this document. Our comments should be adequately addressed before final approval can be considered for the 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

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

Printed on recycled paper.

Mr. David Driggers

May 15, 1996

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cc: Cheryl Mitchell, NAVSTA Mayport
Martha Berry, EPA Region IV, Atlanta
Pat Kingcade, OGC/Trustee File
Terry Hansen, ABB Environmental Services, Tallahassee
Satish Kastury, FDEP Tallahassee
Brian Cheary, FDEP Northeast District, Jacksonville

Enclosure (1)

TB JB JJC/pe ESN _____

Florida Department of
Environmental Protection

Memorandum

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

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

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

DATE: May 2, 1996

SUBJECT: "Final" Corrective Measures Study; Group II Solid Waste Management Units (SWMUs); Naval Station Mayport, Florida.

I reviewed the subject document dated January 1996 (received February 5, 1996). The Navy's revisions in response to my comments dated October 3, 1995, are inadequate and I can not approve the document as final. I have the following specific concern. Page 4-2, Section 4.2.1.1 presents the revised CAO for SWMU 6 and 7. The intent of my original comment on this topic in October 1995 was to encourage the Navy to explicitly address the remediation of contaminated phreatic soil and groundwater. The CAO as stated in the revised CMS addresses source removal as it did before, but offers nothing new concerning remediation of residual contamination in these other media. Until the CAOs and proposed corrective measures satisfactorily address these media in a manner more protective of the environment and public health, the Department will be unable to approve the CMS.