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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FINAL RESOURCE CONSERVATION AND RECOVERY ACT  
FACILITY INVESTIGATION FOR GROUP 1 SOLID WASTE MANAGEMENT UNITS VOLUME  
1 AND 2 NS MAYPORT FL  
5/16/1996  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

# Department of Environmental Protection

Naval Station Mayport  
Administrative Record  
09.01.00.0123

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

May 16, 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

file: glrfi\_fi.doc

RE: Final RFI for Group I SWMUs, Volumes I and II, Naval Station Mayport

Dear David:

I have reviewed the subject document dated March 1996 (received April 5, 1996). The responses to our previous comments are generally adequate; however, there are a number of points that I would like to discuss further and would appreciate your additional clarification.

1. In Dr. Roberts' comments, he expressed concern over the Navy's contention that the landfill areas were unlikely to be developed as residential areas and that a residential scenario was not provided in the risk assessment. I also expressed this concern. While I would like to believe that development in the landfill areas would not occur in the future, my experience and my observations in Florida have shown that development can occur at almost any location. Furthermore, it is the lands in the vicinity of beaches or water bodies that are usually in the greatest danger. Your response alluded to the use of the base Master Plan as a possible vehicle to restrict future land use. I would like to begin exploring our options with respect to land use restrictions. Additionally, should the land use at these areas be proposed for change at a future date, a residential scenario developed now and included in the risk evaluation for the landfill areas would help enable that process. I strongly suggest that, in the absence of a legally enforceable land use restriction mechanism, the residential scenario should be evaluated. To save time and effort in the rewrite of the report, the information thus developed may be included as an appendix for the RFI. The information then may be utilized in the future decision-making processes - including the imposition of land use restrictions, if deemed necessary.
2. Dr. Roberts also expressed concern over the lack of a child component for the ground water risk assessment. The Navy response was to quote correspondence from ABB to a member of the Department staff regarding standard EPA guidance as the reason for not including the child component. I have reviewed the correspondence and I understand the reason for not including the child component (because the adult component exceeded adult risk guidance). In the interest of clarity in the document, and for the record, please

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Mr. David Driggers

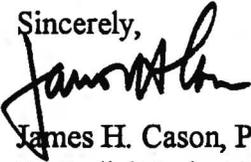
May 16, 1996

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indicate the reason for not including the child component in the RFI. Additionally, the mean salinity of the ground water was used as further justification for not considering the aquifer as truly potable; while I understand and tend to agree that the aquifer could not be expected to produce large amounts of potable water, I am also aware that this is a mean value and that such water could conceivably be blended or used for advanced treatment processes such as reverse osmosis. In any case, for the time being, the area should still be considered as a G-II aquifer.

3. My previous comments 9 and 10 expressed concern about the mortalities observed not only at the ditch at SWMU 4 but also at the perimeter ditch around the SWMUs located east of SWMU 4. High mortalities were also observed there. The report acknowledged the potential ecological risks from the surface water and sediment; however, I am unsure that we are able to adequately characterized the sediments as a possible modality of accumulation of toxic quantities of contaminants that have been (or are being) released in non-toxic or non-regulatory quantities from the SWMUs or even if they are direct evidence of a release. Removal of contaminated sediments will serve as an immediate remedial measure prior to filling the ditch at SWMU 4; however, if the sediments are serving as an accumulation mechanism for low level releases of contaminants from the other areas of Group I that are served by similar ditches, then subsequent removal (possibly via stormwater management procedures) at some future time(s) may be necessary. The Navy should recognize this possibility.

Thank you for the opportunity to review this document. These concerns should be adequately addressed before the document can be considered final. If you have questions or require further clarification, please feel free to contact me at (904) 921-4230.

Sincerely,  
  
James H. Cason, P.G.  
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport  
Martha Berry, EPA Region IV, Atlanta  
Terry Hansen, ABB Environmental Services, Tallahassee  
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Brian Cheary, FDEP Northeast District, Jacksonville

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