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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
ASSESSMENT SAMPLING VISIT REPORT FOR GROUP 3 SOLID WASTE MANAGEMENT
UNITS 20, 21 AND 52 NS MAYPORT FL
7/15/1996
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 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: Review of RCRA Facility Assessment Sampling Visit Report, Group III
Solid Waste Management Units 20, 21 and 52, NAVSTA Mayport

Dear David:

I have reviewed the above document dated February 1996 (received February 13, 1996). The following comments need to be adequately addressed before the document can be considered final:

1. There seems to be conflicting information presented regarding the ground water flow direction and the placement of monitoring wells at SWMUs 20 and 21. On page 2-12, the flow direction is stated as northeast, north and northwest. Figure 2-3 shows (if I interpret it correctly) it as flowing in a westerly direction. I also do not see the rationale for the extreme curves on the bottoms of the 5 and 6 foot contours. I think the 9.5 foot contour should be moved to the right or even omitted as was done with the data between 4.0 and 5.0 feet on the left of Figure 2-3: if the 9.5 foot contour is retained, it should have the same general shape as the other (1 foot) contours. I think we are trying to get too "fine" in our interpretation and placement of the contour. Additionally, the monitoring well listed as MPT-21-MW03S, located on the 8 foot contour, should be labeled MPT-20-MW03S. Finally, the hydraulic positions listed in Table 2-2 should be confirmed.
2. Having corrected Figure 2-3 and referring to Figure 2-2, is the placement of monitoring well MPT-20-MW01S consistent with either the physical location of SWMU 20 (the northwesterly one of two locations) or at least downgradient hydraulically from it? The indicated location is south of the O/W line, not next to the southeast corner of building 1277A as proposed in the workplan. Assuming soil excavation during construction of the O/W line, is the well placed in the optimum location to properly evaluate SWMU 20? If not, how and why is it located where it is? Apply this same general questioning to monitoring well MPT-20-MW03S. Is it located in the optimum location?
3. Page 2-27, Table 2-9: The reference for FDEP has a typographic error ("Department" should replace "Depart.")

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

Mr. David Driggers

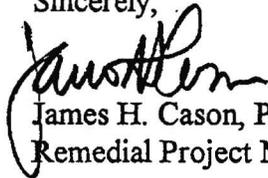
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4. Figure 3-2: Why was the oil-water separator (and associated piping) at SWMU 52 not included in the assessment? Reference to Figure 3-2 in the proposed workplan does not show the separator or the associated line; was this information not available? Additional sampling should be accomplished at this location.
5. Section 2.3.2, page 2.12: Why were the ground water depths at the SWMUs "measured by separate field teams" on July 19, 1995? If inconsequential, no response required.
6. Section 3.4.1, page 3-22, paragraph 2: Please explain or correct the discussion concerning the "concentrate ion." I think you meant "concentration."

Thank you for the opportunity to review this document. If you have questions or require further clarification, please 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
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TJB B JJC JR ESN ESN