

N60201.AR.000360  
NS MAYPORT  
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FIELD SAMPLING PLAN, DRAFT WORK PLAN, QUALITY  
ASSURANCE PROGRAM PLAN, REVISIONS TO INVESTIGATIVE DERIVED WASTE  
MANAGEMENT PLAN, REVISIONS TO HEALTH AND SAFETY PLAN AND ADDIT

1/21/1997

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

January 21, 1997

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: 191&15b.doc

RE: Field Sampling Plan; Draft Work Plan; Quality Assurance Program Plan; Revisions to IDW Management Plan; Revisions to Health and Safety Plan - Additional Assessment Using Innovative Technology/Methodology at the SWMU 15 and Building 191 Area, ICON Environmental Services, NAVSTA Mayport

Dear David:

I have reviewed the above documents dated December 1996 (received December 26, 1996); the documents are generally well prepared; however, I have some concerns which should be considered:

## Revisions to the IDW Management Plan

1. Section 4.2 indicates that "cuttings from borings exhibiting *non-detected* concentrations will be assumed clean." I would think the contractor would indicate that concentrations *below regulatory requirements* would be considered clean (italics added for emphasis).
2. Section 4.4: the type of analysis for the decontamination water should be specified (I am not aware of a TCLP analysis for water).
3. Section 5.0: the location of IDW acquisition should be on the label (MW-4, etc.).

## Revisions to Health and Safety Plan

4. Section 2.2: although referred to in other documents, the pressure washer should be a steam pressure washer.

## Site Management Plan

5. Although I have no specific objection to it, the proposed deep boring, MPT-TC-B2 is proposed within the approximate boundary of the contaminant plume. My concern is that if deep contamination is found, questions would be raised regarding the possible effects

Mr. David Driggers  
January 21, 1997  
Page 2

from placing this deep boring within the suspected area of a DNAPL plume. Similarly, there are a number of construction boreholes noted on several figures (such as Figure 1 of the Field Sampling Plan); if these are of significant depth, the assessment should consider their presence and possible effect on the site contamination distribution.

#### Quality Assurance Program Plan

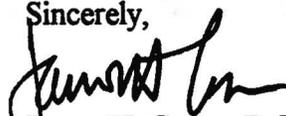
6. I cannot tell if the contractor has a Florida-approved Quality Assurance Plan. Merely paraphrasing or stating that the FDEP SOPs are adopted or will be followed is not sufficient. Please refer to Chapter 62-160 (3), F.S. for clarification. Such a plan, when approved, will be issued a Florida Certification Number which should be referred to when discussing the Plan or when documenting actions undertaken subsequent to the plan. In checking the January 2, 1997 Department List of Approved Contractors, I did not find a listing for "ICON." If the plan has been approved after this date or in another name, please document the approval number.

#### Field Sampling Plan

7. The plan (and other documents) discusses the installation of three conventional monitoring wells at each site. For the record, more wells may have to be installed, especially if the "deep" wells are significantly contaminated. I have discussed this on several occasions when this project has been considered. Conventional monitoring wells are required for confirmation of conditions indicated by the various screening techniques used in investigations, direct push wells being one example. If the data from the conventional monitoring wells varies significantly from the screening data, additional conventional wells must be installed.

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  
Satish Kastury, FDEP, Tallahassee  
Jerry Young, City of Jacksonville

TJB B JJC JJC ESN ESN