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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT INTERIM MEASURE PERFORMANCE
SPECIFICATIONS GROUP 3 SOLID WASTE MANAGEMENT UNIT 14 NS MAYPORT FL
7/17/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

July 17, 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: G3_S14IM.doc

RE: Draft Interim Measure Performance Specifications, Group III, SWMU 14, NAVSTA
Mayport

Dear David:

I have reviewed the above document dated April 1997 (received April 10, 1997). Please consider the following comments in preparing the final document:

1. There are a number of minor typographical/graphic errors which will not be enumerated here. I have met with ABB and reviewed them.
2. Table 3-1, page 3-6 and 3-7: it appears that the "--" designation is used erroneously in the Flame Ionization Detector, Charcoal Filtered column.
3. Figures 3-1, 3-2 and 3-3: it appears that these figures were constructed from the unfiltered OVA-FID readings. This should be confirmed and stated within the report, if not on the figures.
4. Figures 3-3 and 3-4: please evaluate the applicability of these data, considering the soil samples may have been collected from below the water table. Modify or delete as necessary.
5. Section 4.4.1, Soil Interim Measure: this section was prepared from provisional information provided by the Department, and I commend the Navy for this approach. Unfortunately, some of those data have been revised. I have forwarded the latest (and perhaps final) edition of the Tonner-Navarro & Roberts paper dated June 18, 1997 and will be working with ABB to correlate any changes or new information.
6. The statement is made in several places regarding the utilization of the existing concrete surface as an institutional control. I have no objection to this approach; however, the Navy should be aware of the limitations imposed on this area should this be the remedy for the contamination at the site.

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

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Mr. David Driggers

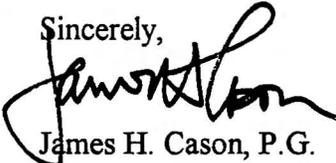
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7. Page 4-7: please elaborate, perhaps using appropriate parameter ranges, on the statement that "the ground water beneath SWMU 14 appears to contain sufficient electron acceptors....for aerobic biodegradation to occur."
8. Section 5.1.2, Ground Water Interim Measure, page 5-2: was the potentiometric map really prepared from measurements made in 1977?
9. Section 5.2 Drainage Ditch: please elaborate on the proposed cap, perhaps by an oversketch of the lower photograph of SWMU 14, Drainage Ditch, page C-10. This would help justify the capping and better define the description of "small areas" described on page 5-3.
10. References: It appears that the reference for the Florida Ground Water Guidance Concentrations, June 1994, is missing. Additionally, the date of the Jeng et al. reference is June 15, 1992.

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (850) 921-4230.

Sincerely,



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

cc: Cheryl Mitchell, NAVSTA Mayport
Martha Berry, EPA Region IV, Atlanta
Frank Lesesne, ABB Tallahassee
Satish Kastury, FDEP, Tallahassee
Jerry Young, City of Jacksonville

TJB B JJC JJC ESN ESN