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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING OPERATIONAL PLAN FOR SOLID WASTE MANAGEMENT  
UNITS 14, 23 AND 24 NS MAYPORT FL  
8/11/1997  
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

Jim 519

August 11, 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: IM@14etc.doc

RE: Operational Plan for SWMUs 14, 23 and 24, Bechtel Environmental Inc., Naval Station  
Mayport, Mayport, FL

Dear David:

Mr. Greg Brown, P.E., and I have reviewed the above document dated July 21, 1997 (received July 23, 1997). Mr. Brown's comments are attached. We have noted a number of deficiencies in the proposed aspects of the project which should be adequately addressed before the document can be considered final:

1. This document utilizes material based on draft documents; it seems prudent that an operational plan should be based on data and proposals that incorporate Federal, State and Navy concerns or comments which may exist pursuant to the draft document. Please insure that this aspect is addressed. Also in this regard, the proposal states that these interim measures have been "selected." To my knowledge, a formal selection has not occurred and comments in this letter do not, *ipso facto*, constitute formal selection or approval. The mention of "selection" should be deleted.
2. Section 2.1 Mobilization: I assume that "fluid runoff control" includes the necessary storm water and erosion control practices that will be in place or available during the time of remediation. Specific mention, if not diagrams, which indicate actual, rather than theoretical measures should accompany the proposal; this applies especially to the SWMU 14 portion of the proposal; what are the plans for storm water handling/disposal during the duration of the cofferdam?
3. Section 2.2 Waste Management: the lines of responsibility for the manifesting and disposal of non-hazardous waste should be clearly delineated.
4. Section 2.3 SWMU 14 Interim Measures: Specific information should be furnished for this project including diagrams so that the actual type (design) and actions proposed to be

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accomplished can be evaluated. How will the "transition of Gunite® to existing grade" be accomplished? Generalities, such as "an approved appropriately sized container," should be avoided. If it is worth mentioning, be specific. How will "debris and sediment" be removed? How will the degree of vegetation and debris removal be determined? One of the concerns for this site is maintaining site integrity, something that may be compromised by the inappropriate use of heavy equipment. How will the contractor "verify the suitability" of the proposed design? This should be part of the certified submittal. The area is a specific coastal habitat; what "natural vegetation" will be used (and how will it be used) to re-seed the area. This section needs more detailed explanation of all the proposed actions.

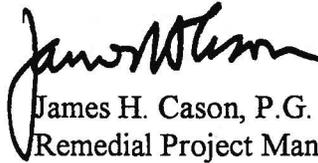
5. Section 2.4 SWMU 23 Interim Measures: will areas of asphalt or concrete removal be replaced with like material?
6. Section 2.4.2 Confirmatory Sampling: This section is somewhat confusing in that 15 foot grids are proposed; yet, the four smaller removal areas (Figure 3) appear to be 20 foot squares. Additionally, the large polygon in the center has an undetermined area. I suggest that the confirmatory sampling consist of: (a) each approximately 20 foot grid square, and (b) one from each 20 foot grid or equivalent area from within the large polygon that is depicted in Figure 3. This will necessitate a devised method to assure sampling is uniform. What will be the procedures to be followed if confirmatory samples do not meet the screening criteria (which should be clearly stated)? The additional excavation and additional confirmatory sampling should be adequately described. Additionally, some sidewall sampling would also be required. Describe that action. A section describing the Quality Control aspects for the project, including reporting levels, validation procedures, laboratory turnaround times, etc., should be included. We can discuss and refine these requirements very easily at our next meeting or by telephone.
7. Based on the proposed actions at SWMUs 23 and 24, there will be a time period following excavation, before results are confirmed, that open holes will be present. Plans or operational methods for securing these areas should be described/furnished. Based on previous experiences at Cecil Field and during the NELP Low Temperature Thermal Desorption Demonstration at Mayport, a storm water management plan should be formulated and described, including storm water disposition during tropical or other heavy rainfall events. Finally, the contractor should assure that it possesses the latest Department and EPA cleanup/guidance materials for soils.
8. Section 2.5.2 Excavation: Please attach the appropriate Technical Specifications (Standard Specification 22567-001-SP000-006, or appropriate) for the type of excavation to be performed, to the document. The contractor should also acknowledge that any monitoring wells that are damaged or disturbed will be replaced.

*Cut out  
sidewall  
samples*

Mr. David Driggers  
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Thank you for the opportunity to comment on the Workplan. If you need further clarification or additional information, please feel free to contact Greg Brown or myself. You can reach us at 850-488-3935.

Sincerely,



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

Attachment (1)

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

TJB B JJC JR ESN 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 *JJE for T*

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

**DATE:** August 8, 1997

**SUBJECT:** Operational Plan for SWMUs 14, 23, and 24, Bechtel Environmental Inc., Naval Station Mayport, FL.

I reviewed the subject document dated July 21, 1997 (received July 23, 1997), and I concur with your comments and suggestions. I have a few minor comments as well:

1. The U.S. EPA's National Sediment Quality Survey identified the lower reaches of the St. Johns River as one of 96 Areas of Probable Concern in the U.S. These areas have sediment contamination associated with high probabilities of adverse effects. Both point and non-point sources of pollutant discharges to the river are suspected of being responsible for this condition. Though a minor source, adequate performance of SWMU 14's "sediment retention pond" will help prevent further degradation of sediment and surface water quality in the lower St. Johns River. Therefore, I recommend that the design criteria of the "sediment retention pond" at SWMU 14 be reassessed to determine how lining the impoundment will affect its performance as a water quality control facility. Other modifications to the impoundment may be needed if its water treatment functions are impacted by lining it with Gunite®.
2. Related to the comment above, if attenuation of peak flows are reduced because of lining the impoundment, higher outflow velocities may increase downstream erosion. Again, both the conveyance and water quality functions of the impoundment should be reassessed to determine the impact of the proposed modifications.
3. The Navy should contact the ACOE District Engineer to determine permit requirements for construction of the temporary coffer dam. It appears to be a minor structure and little more than submittal of a Notice of Intent may be necessary, if that much. The Navy should first confirm requirements with the Corps before construction to avoid conflicts.

Please call me if you have any questions at (850) 488-3935.