

N60201.AR.000402
NS MAYPORT
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT TECHNOLOGY EVALUATION REPORT FOR THERMAL
DESORPTION OF PETROLEUM IMPACTED SOIL AT SOLID WASTE MANAGEMENT UNITS
6 AND 7 NS MAYPORT FL
9/30/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Building
2800 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

September 30, 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: nelp_6&7.doc

RE: Draft Technology Evaluation Report: Naval Environmental Leadership Program
Technology Demonstration for Thermal Desorption of Petroleum-Impacted Soil at Solid
Waste Management Units 6 and 7

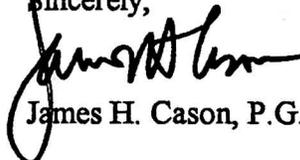
Dear David:

I have reviewed the above document dated July 1997 (received July 28, 1997). While this document is not a typical nor required IRP document, the following comments seem appropriate and should be considered by the Navy:

1. Please confirm the operating temperatures (refer to Section 2-2, page 2-5) as noted (the entry appears to be in question).
2. Because of the uncertainty in retreatment of some soil batches that was noted in the desorber operating records, the Navy should consider conducting limited random sampling to insure that the remediated soil is in conformance with clean soil standards. These data can then be incorporated into the final overall evaluation of SWMUs 6 and 7.
3. I suggest that one of the "lessons learned" in this demonstration is that the project would have been improved if the Navy had direct, full-time and responsible charge of the actual operation of the desorption unit; this perhaps could have helped assure that all documentation was sufficient.

Thank you for the opportunity to review this document. If you need further clarification or any additional information, please feel free to contact me at 850-921-4230.

Sincerely,



James H. Cason, P.G.

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

Printed on recycled paper.

Mr. David Driggers
Page Two
September 30, 1997

Remedial Project Manager

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

TJB B JJC JR ESN ESN