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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT NAVAL LEADERSHIP PROGRAM TECHNOLOGY  
EVALUATION REPORT FOR SOLID WASTE MANAGEMENT UNIT 14 NS MAYPORT FL  
10/1/1997  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

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Governor

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Virginia B. Wetherell  
Secretary

October 2, 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

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RE: Draft Naval Environmental Leadership Program Technology Evaluation Report for Solid Waste Management Unit 14, Naval Station Mayport

Dear David:

I have reviewed the above document dated July 1997 (received July 18, 1997). This document is not a typical nor required IRP document; however, the following comments should be considered by the Navy:

1. The technology demonstration occurred during the colder Winter months; as such, I am unsure as to the value of any conclusions regarding the possible efficacy of the technology. For this reason I recommend that the Navy consider conducting any/all bioremediation demonstration projects only in the warmer months of the year. It appears that the demonstration did not adequately establish that the bioremediation method of remediation of the concrete surfaces was responsible for the observed effects at SWMU 14.
2. One of the underlying reasons for the consideration of this site as a NELP project was due to the fact that the storm water runoff from the detention pond often failed criteria for petroleum constituents prior to discharge into the St. Johns River. In the conclusions, ABB noted little difference in the surface water baseline and performance evaluation samples from this area. In this respect, the technology did not appear to yield beneficial results. This technology should therefore not be utilized for remediation of petroleum-contaminated concrete surfaces and certainly not for those instances where the petroleum has penetrated into the material.
3. The technology may have had a beneficial effect on the petroleum-contaminated soil; however, an adequate evaluation which accounted for the effects of rototilling was not available. Future projects of this nature should include this aspect.

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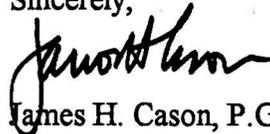
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4. How does the Navy intend to utilize the data from this demonstration in the evaluation of the present status of these portions of SWMU 14?

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.  
Remedial Project Manager

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

TJB  JJC  ESN 