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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT TECHNOLOGY EVALUATION REPORT FOR SOLID
WASTE MANAGEMENT UNIT 15 NS MAYPORT FL
10/1/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



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NAVSTA Mayport Administrative Record
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Mr. David Driggers
Department of the Navy, Southern Division
Naval Facilities Engineering Command
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**RE: Draft Technology Evaluation Report: Naval Environmental Leadership Program
Technology Evaluation Report for Solid Waste Management Unit 15**

Dear David:

I have reviewed the above document dated June 1997 (received June 25, 1997). I note that although this document is not a typical nor required IRP document, the following comments seem appropriate and 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 efficacy of the technology type. It could be argued that the observed results could result from merely the physical mixing of the site soils or by the "hot spot" nature of the contamination. Accordingly, I must conclude that the demonstration did not adequately establish that the bioremediation method(s) were responsible for any positive observed effects at SWMU 15.
2. This technology would have been better demonstrated on a site where the extent of contamination was more uniform in concentration and areal extent.
3. Because of the variable and questionable nature of the data, does the Navy intend to utilize it in the evaluation of the status at SWMU 15 and if so, how will this will be done?

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

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

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