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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING INTERIM MEASURE PERFORMANCE SPECIFICATIONS FOR  
GROUP 3 SOLID WASTE MANAGEMENT UNIT 14 NS MAYPORT FL  
12/16/1997  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

32228-000  
09.01.00.0068

# Department of Environmental Protection



Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 16, 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: 14impsF.doc

RE: Interim Measure Performance Specifications Group III SWMU 14, Naval Station  
Mayport; Mayport, Florida

Dear David:

I have reviewed the above document dated September 1997 (received October 3, 1997). The document addresses three contaminant types: soil and ground water at the fire training facility and sediment in an adjacent ditch. I have the following comments:

1. Soil IM: the Navy proposes no further action with engineering controls, furnished by existing concrete structure(s). I concur in that recommendation, provided an adequate land use restriction and engineering control maintenance agreement can be developed that is acceptable to the State of Florida.
2. Ground Water IM: the Navy has evaluated the natural attenuation characteristics of the site and has recommended that a monitoring program with natural attenuation, similar to that described in Chapter 62-770.690, F.S., should be instituted. I concur with that recommendation, provided an adequate monitoring program is presented for this portion of the site.
3. Ditch Sediments: the Navy has proposed that the ditch be lined with concrete, thus forming an engineering control. I concur with that recommendation, provided an adequate land use restriction and engineering control maintenance agreement can be developed that is acceptable to the State of Florida.
4. The proposed land use restrictions described above must remain in place, according to the final land use agreement; if the Navy should propose changing the land use, any remaining contamination at the site shall be addressed according to appropriate State of Florida regulations.

Mr. David Driggers  
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In several of the Mayport Naval Station Partnering meetings, we discussed the possibility of using bioventing as a means of helping remediate the soil at this site, possibly utilizing mechanical components of the bioslurping system presently at SWMU 7. We also discussed the use of oxygen releasing compounds ("ORCs") as a possible means of decreasing the monitoring time for natural attenuation of the ground water. I hope that the Navy will continue to consider these possibilities since the magnitude and extent of contamination is not great at SWMU 14 and these methods may help hasten the time for clean closure and unrestricted use of the land.

Thank you for the opportunity to review this document. If you have any questions, please contact me at 850-921-4230.

Sincerely,



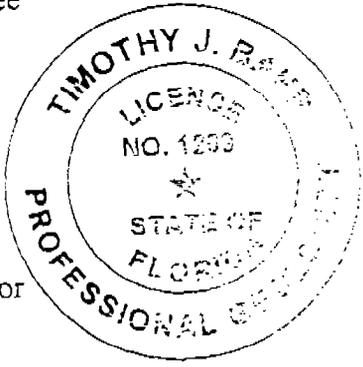
James H. Cason, P.G.  
Remedial Project Manager

cc: Jay Bassett, USEPA, Atlanta  
Cheryl Mitchell, NAVSTA Mayport  
Frank Lesesne, ABB, Tallahassee

Reviewed by:



Timothy J. Bahr, P.G.  
Professional Geologist Supervisor  
Bureau of Waste Cleanup



12/16/97  
Date

JJC  ESN 