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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FINAL INTERIM MEASURE PERFORMANCE SPECIFICATIONS  
FOR GROUP 3 SOLID WASTE MANAGEMENT UNITS 23, 24 AND 25 NS MAYPORT FL  
12/29/1997  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

December 29, 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: G3impsF.doc

RE: Final Interim Measure Performance Specifications Group III SWMUs 23, 24 and 25,  
Naval Station Mayport; Mayport, Florida

Dear David:

I have reviewed the above document dated September 1997 (received November 10, 1997). The document addresses soil contamination at three SWMUs and the Former Target Range Backstop. Following are my comments regarding these sites and associated recommendations:

1. SWMU 23: this site is divided into four task areas as follows:
  - a.) West of Building 14: soil contamination by arsenic, copper and lead are documented at the site in concentrations above residential SCGs but less than industrial SCGs. The Navy proposes no action. I concur in that recommendation, provided an adequate land use restriction for this site can be developed that is acceptable to the State of Florida.
  - b.) North of Building 54: soil contamination by arsenic has been documented at the site in concentrations above industrial SCGs. The Navy proposes an IM in those areas exceeding the industrial SCG. I concur in that recommendation, provided an adequate land use restriction for this site can be developed that is acceptable to the State of Florida.
  - c.) South of Building 55: soil contamination by arsenic has been documented at the site in concentrations above industrial SCGs. The Navy proposes an IM in those areas exceeding the industrial SCG. I concur in that recommendation, provided an adequate land use restriction for this site can be developed that is acceptable to the State of Florida.
  - d.) South of Building 57: soil contamination by beryllium has been documented at the site in concentrations above industrial SCGs. The Navy proposes an IM in those areas exceeding the industrial SCG. I concur in that recommendation, provided an adequate land use restriction for this site can be developed that is acceptable to the State of Florida.

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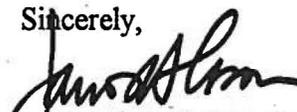
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2. SWMU 24: soil contamination by arsenic, beryllium and benzo (a) pyrene has been documented at the site in concentrations above industrial SCGs. The Navy proposes an IM in those areas exceeding the industrial SCG. I concur in that recommendation, provided an adequate land use restriction for this site can be developed that is acceptable to the State of Florida.
3. SWMU 25: soil contamination by aldrin and dieldrin are documented at the site in concentrations above industrial SCGs. The Navy proposes no action based on the sampling locations proximity to the building foundation and the belief that these materials were applied pursuant to legal and accepted practices for building foundation treatment. The contaminant levels of these materials are also above leeching guidance concentrations. Please sample the ground water in the proximity of these samples, analyze for pesticides and submit the results as a letter report addendum to the document, including modified recommendations for this portion of the site if necessary.
4. Former Target Range Backstop: soil contamination by benzo (a) pyrene and dibenz (a, h) anthracene was documented in excess of industrial SCGs in a duplicate sample but not in the regular sample. The Navy contends that the duplicate sample was likely biased by vehicle emissions or asphalt particles and proposes no action. Please resample the soil at this site and analyze for semivolatile constituents. Submit the results as a letter report addendum to the document, including modified recommendations for this portion of the site if necessary.

I will evaluate the SWMU 25 and Former Target Range Backstop portions of this report after I receive the additional data for those sites. The land use restrictions described for the remaining above sites are with respect to residential or non-industrial use of the sites. These sites are presently in industrial land use and those uses are not expected to change. IMs are proposed to reduce contaminants below industrial SCGs but which do not address the residential SCGs and are thus the reason for requiring a land use restriction to non-residential use. The restrictions must remain in place according to a suitable 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. If an adequate land use restriction agreement cannot be developed, the State of Florida may re-evaluate it's position regarding the above sites.

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

Sincerely,



James H. Casen, P.E.

Remedial Project Manager

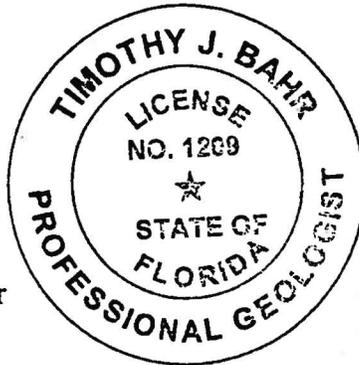
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cc: Tony Ettore, FDEP OGC, Natural Resources Trustee File  
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Reviewed by:



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



1/6/97  
Date

JJC  ESN ESN