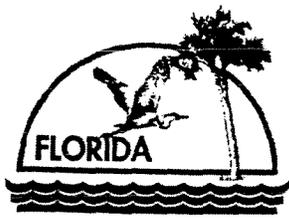


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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT INTERIM MEASURE PERFORMANCE
SPECIFICATIONS GROUP 2 SOLID WASTE MANAGEMENT UNIT 15 NS MAYPORT FL
12/7/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

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

Kirby B. Green, III
Secretary

December 7, 1998

Ms. Adrienne Wilson
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, SC 29419-9010

file: 15imps_1.doc

RE: Draft Interim Measure Performance Specifications, Group II Solid Waste Management
Unit 15, U.S. Naval Station, Mayport, FL

Dear Ms. Wilson:

I have reviewed the above referenced document dated May 1998 (received May 14, 1998). I delayed my review because the conditions at SWMU 15 have changed considerably since this document was produced. As you are aware, the shallow aquifer had become more anaerobic following the technology demonstration by FIFCO, a condition that the Partnering team believed was responsible for the appearance of elevated levels of arsenic in the ground water at the site. Recent screening data now indicates that this condition is stabilizing and the arsenic levels are greatly reduced, which we believe to be as a result of the shallow aquifer becoming more aerobic, as it was prior to the application of organic materials on the site during the NELP demonstration project.

The document is generally well prepared, but since conditions have changed so much on the site since it was produced, please consider the following comments during the preparation of the final draft:

1. As we have previously discussed for other sites at NAVSTA Mayport, please insure that the soil, surface water and ground water data are evaluated with respect to the soil, surface and ground water (Table 3b) values in Chapter 62-785, F.A.C. This should not greatly affect this document since soil was not included as part of the performance specifications. When soils are evaluated in the future, please note that the evaluation should be the lower of either the direct exposure I or the appropriate leachability level, if ground water is indicated to be contaminated. If necessary, please modify the appropriate tables to reflect this change; if this is not feasible, a section in the appendix which fully documents that this was accomplished, along with the findings, is acceptable. In addition, please reevaluate the existing COPC, risk evaluations, etc., as necessary to also reflect this change.

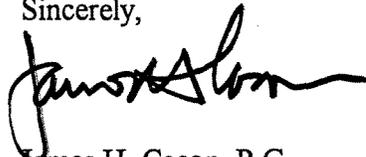
"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Ms. Adrienne Wilson
Page Two
December 7, 1998

2. Section 5.1, Environmental Fate: this section has extensive discussion about the "aquatic" environment. Please clarify whether the author was referring to the aquatic environment as typified by surface water features or whether the ground water scenario was actually (and specifically) considered.
3. Figure C-22, Appendix C: based on my examination of this figure, specifically the arsenic concentration of well MPT-15-DPW6S of 370 ug/L, please insure that we have installed enough monitoring points (to the northeast direction) to characterize the arsenic contamination at the site. I am aware that some additional points were installed; therefore please update the appropriate figures and tables. Any future interim measures, such as is specified in paragraph four on page 6-4, should account for this apparent discrepancy and recommend additional sampling points if necessary. Additionally, future interim measures should include sufficient data collection to enable updated ground water movement prediction, along with attenuation/concentration predictions.

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: Randy Bishop, NAVSTA Mayport
Brian Cheary, FDEP Northeast District

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