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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING OXYGEN RELEASING COMPOUND DEMONSTRATION AT
SOLID WASTE MANAGEMENT UNIT 14 NS MAYPORT FL
12/14/1998
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 14, 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: 14orc1.doc

RE: ORC Demonstration Project at SWMU 14, U.S. Naval Station, Mayport, Florida

Dear Ms. Wilson:

I have reviewed the following documents prepared by Bechtel Environmental Incorporated on behalf of the above project:

1. Proposal for Department of the Navy Contract No. N62467-93-D-0936, SWMU 14 - Oxygen Releasing Compound Technology Demonstration, dated May 1998 (received June 19, 1998).
2. Scope of Work for Solid Waste Management Unit (SWMU) 14 Oxygen Releasing Compound (ORC) Technology Demonstration, Naval Station Mayport, dated 7/29/98.
3. Execution Plan for Oxygen Releasing Compound Demonstration at Solid Waste Management Unit 14, Naval Station Mayport, dated August 1998 (received October 1, 1998).
4. Addendum to the Quality Control Program Plan for Oxygen Releasing Compound Demonstration at SWMU 14, dated September 15, 1998 (received October 1, 1998).

In conjunction with the Naval Station Mayport Partnering Team, we have reviewed both the concept and the specifics of the project described in the above documentation. The project consists of placement of ORC (oxygen releasing compound) slurry at selected points at SWMU 14 at Mayport Naval Station with monitoring the ground water in selected wells prior to and following placement. Mr. Rod Padgett of Bechtel has confirmed that the demonstration will use only the Regensis™ brand of ORC. I note that this brand has been approved for such use by the Department in a letter dated July 20, 1997 (copy appended). At his request, I have also submitted

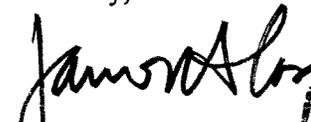
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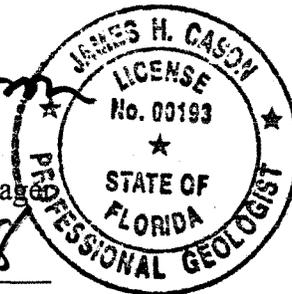
a copy of a completed Form UIC_2 as notification of the project to Mr. Richard Deuerling of the Underground Injection Control Program.

Based on the submitted documentation, the demonstration project consisting of emplacement of ORC into selected locations at SWMU 14, Mayport Naval Station, is approved for a single placement event. Documentation of the project and results should be submitted to the Department following completion. These documents should fulfill Professional Certification standards of the State of Florida as specified in Chapter 471, F.S. or Chapter 492, F.S., as appropriate.

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



12-14-98
Date

Attachment (1)

cc (without attachment):

Greg Brown, FDEP, Tallahassee
Randy Bishop, NAVSTA Mayport
Rod Padgett, Bechtel, Jacksonville
Brian Cheary, FDEP Northeast District
Martha Berry, U.S. EPA Region IV, Atlanta
Frank Lesesne, HLA, Tallahassee

TJB B JJC JJC ESN ESN