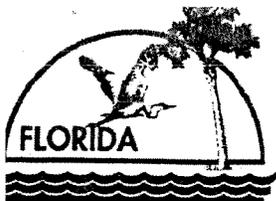


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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING CORRECTIVE MEASURES STUDY FOR SOLID WASTE
MANAGEMENT UNITS 2, 3, 4, 5 AND 22 NS MAYPORT FL
5/17/2001
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

May 17, 2001

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: 2etal_cms11.doc

RE: Corrective Measures Study for Solid Waste Management Unit Numbers 2, 3, 4, 5 and 22;
U.S. Naval Station Mayport, Florida

Dear Ms. Wilson:

Mr. Greg Brown and I have reviewed the above document dated February 2001 (received March 2, 2001). Mr. Brown's comments are attached. My comments follow. Please address all comments in the final document.

1. In the discussion regarding the recommended surface water corrective measure (page 9-40), it is stated that "Alternative 2 relies on the recovery of the area following cessation of dredge material disposal..." The Navy is currently assessing the use of dredge material from SWMU 50 in a recycling project which involves making brick from the spoil material. Does the Navy intend to utilize SWMU 50 for future dredge material spoil disposal? Will that affect the recommendation for the surface water at these sites?

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

Attachment (1)

CC: Bill Raspet, NAS Jacksonville
Terry Hansen, TetraTech, Tallahassee
Craig Benedikt, EPA Region IV, Atlanta

TJB JJC ESN

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DEPARTMENT OF THE NAVY

NAVAL STATION

MAYPORT, FLORIDA 32228-0112

JC/ESV
JE FYI

IN REPLY REFER TO:
5090.12/.14
5090.15

Ser N4E/001271

BUREAU OF WASTE CLEANUP MAY 09 2001

MAY 14 2001

TECHNICAL REVIEW SECTION

Mr. Jim Cason
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Cason:

SUBJECT: RENEWAL OF HAZARDOUS AND SOLID WASTE AMENDMENT (HWA) PERMIT
#FL9170024260, NAVAL STATION MAYPORT

Subject permit issued by the U.S. Environmental Protection Agency, Region Four, expires June 15, 2003. Naval Station (NAVSTA) Mayport understands that, due to the recent delegation of HSWA authority to the State of Florida, your Department plans to require permit renewal in 2001. We respectfully request postponement of this action until the summer of 2002 for the following reasons: First, the Corrective Action (CA) program at NAVSTA Mayport is very near completion. We are currently in the process of drafting ten Statements of Basis (SOB) and fifteen Corrective Measures Studies (CMS); we expect these to be final by the end of fiscal year (FY) 2001. Second, there are no FY 2001 funds for the permit renewal and none will be available until at least mid-FY 2002. To renew the HSWA permit in FY 2001, NAVSTA Mayport will have to reallocate funds from another regulatory required project.

Even if a FY 2001 reallocation is possible without incurring a violation, NAVSTA Mayport maintains that finalizing the major SOB and CMS documents will require a permit modification next year, FY 2002; this is another currently unfunded cost and an unnecessary process if you allow us to renew in FY 2002.

NAVSTA Mayport submits that a FY 2002 HSWA permit renewal application that includes the remaining portions of the CA program will provide a more complete document. Also, it will be more economical for both NAVSTA Mayport and your Department through reduced preparation and review costs and, finally, it will allow NAVSTA Mayport to use programmed funds.

Thank you for your consideration. If you have any questions, please contact Cheryl Mitchell, Environmental Director at 904-270-6730 x201.

Sincerely,


CHERYL L. MITCHELL
Director, Environmental Division
By direction of the
Commanding Officer

Copy to:

- U.S. Environmental Protection Agency, Region 4 (Craig Benedikt)
- Florida Department of Environmental Protection, Northeast District (E. Frey)
- Commander, Navy Region Southeast (N46E)
- Navy Public Works Center, Jacksonville (Code 300)
- Naval Facilities Engineering Command, Southern Division (Code 18)
- Naval Air Station, Jacksonville (Code 184 Bill Raspet)