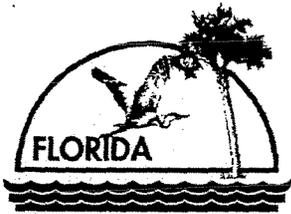


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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT CORRECTIVE MEASURES STUDY FOR SOLID WASTE  
MANAGEMENT UNITS 19, 26, 28 AND 56 NS MAYPORT FL  
3/9/2004  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

March 9, 2004

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: 19\_26\_28\_56CMS1003.doc

RE: Draft Corrective Measures Study for Solid Waste Management Units 19, 26, 28 and 56,  
Naval Station Mayport, Mayport, Florida

Dear Ms. Wilson:

I have reviewed the above document dated October 2003 (received October 31, 2003). The document is generally well written and collectively examines four separate SWMUs. I will comment on each one individually. Please note that changes in the final document may prompt changes to these comments.

#### General Comments:

1. Development of Background screening numbers followed our agreed-on procedures; however, I was under the impression that in the case where we had less than 10 analytical values, we would not use the "two times mean" value. Although I have no substantial objection to it, additional discussion and reasoning for its use would be useful.
2. With respect to the final boundaries for these sites, do we have a good delineation of the extent of "industrial" contamination? Another way of putting it is, do we know where the "residential" exposure scenario begins? That is, of course, how we determine the LUC boundary.
3. It may be that some of these recommendations could change if the soil areas were subjected to a risk-based evaluation, such as a ProUCL analysis. I support such an action and we should discuss this at the next Partnering meeting.

#### SWMU 19: Naval Aviation Depot (NADEP) Blasting Area

1. The document recommends industrial use restrictions and monitoring for the site. We need to decide on the use of the term "non-residential" in place of "industrial", but I am in basic concurrence with the intended remedy.

Ms. Adrienne Wilson  
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SWMU 26, Landfill C

1. There are numerous instances where the Residential and Industrial scenario SCTLs are not in agreement with the Chapter 62-777, F.A.C. values. These need to be corrected. Please check all values in all of the tables.
2. The recommendation is for "No Further Action" based on the conclusion that "no contaminants exceeded residential standards," a statement that is in error. I do not concur with that recommendation. The recommendation should be for non-residential (industrial) land use controls.

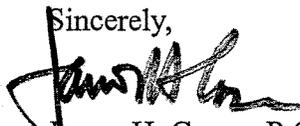
SWMU 28, Defense Reutilization and Marketing Office Yard

1. The recommendation is for non-residential (industrial) land use controls. I concur with that recommendation.

SWMU 56, Building 1552 Accumulation Area

1. The recommendation is for "No Further Action" based on the conclusion (Section 5.7) that "no contaminants exceeded residential standards." I cannot concur with that recommendation based on the presence of arsenic in the range of 0.94 mg/kg, as presented in Table 5-3. The appropriate recommendation is for non-residential (industrial) land use controls. Revised statements in various sections of the text (such as Section 5.3.2.1 on page 5-14) are also necessary to correlate those observed values.

If you need further clarification or any additional information, please feel free to contact me at 850-245-8999.

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

CC: Craig Benedikt, EPA Region IV, Atlanta  
Terry Hansen, Tetra Tech, Tallahassee

JJC  ESN 