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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 REVISION 1 NS MAYPORT FL  
2/1/2005  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

February 1, 2005

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

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RE: Corrective Measures Study for Solid Waste Management Units 2, 3, 4, 5 and 22, Revision 1, Naval Station Mayport, Mayport, Florida

Dear Ms. Wilson:

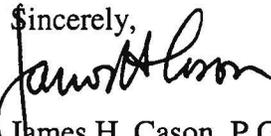
I have reviewed the above document dated June 2004 (received July 12, 2004). The document describes the proposed corrective measures for the named SWMUs, generally land use controls and monitoring, but also removal of contaminated sediments. Please address the following in the final document:

1. The document has noted varying amounts of soil, sediment, surface water and groundwater contamination at the sites. Are the investigational data sufficient to delineate the boundary of Industrial Scenario contaminants? Should additional delineation be accomplished, the results of which would be utilized in the overall management of the media at these SWMUs? If not, how does the Navy propose to determine the final boundary for the sites?
2. During recent Partnering meetings, we discussed the possibility of not removing the ditch sediments and placing them in another adjoining SWMU. In the summary discussion for sediment (page ES-6), it is stated, "In lieu of current sediment sample analyses documenting natural recovery of the watershed following the cessation of dredge slurry disposal, only Alternative 3 was determined to provide short and long-term ecological protection." Since dredging is currently scheduled to resume in the near future, will dredge spoil placement affect the monitoring results for any of the media on these SWMUs? If so, what will the Navy do in response?
3. Similar to the sediment discussion and my preceding observations, on page ES-7, regarding surface water, it states that "Alternative 2 also relies on the general recovery of the watershed following cessation of dredge disposal activities at SWMU 50 which ended in 1994." Given that dredging and dredge material placement is anticipated at SWMU 50, are our assessments and conclusions for the five named SWMUs sufficient? Are the recommendations valid?

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4. Please provide a summary discussion regarding SWMU 50 and its effects within the context of the above SWMUs, especially their future management and use.

Thank you for the opportunity to review this document. Please address these concerns and finalize it. If you require further clarification or other assistance, please contact me at 850-245-8999.

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

CC: Craig Benedikt, US EPA Region IV, Atlanta  
Terry Hansen, Tetra Tech, Tallahassee  
Diane Lancaster, NAVSTA Mayport  
Tim Bahr, FDEP, Tallahassee

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