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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING CORRECTIVE MEASURES STUDY FOR SOLID WASTE  
MANAGEMENT UNITS 47, 53 AND 55 NS MAYPORT FL  
*2/27/2006*  
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 27, 2006

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: 47\_53\_55CMS0805.doc

RE: Corrective Measures Study for Solid Waste Management Units 47, 53 and 55, Revision 0,  
Naval Station Mayport, Mayport, Florida

Dear Ms. Wilson:

I have reviewed the above document dated August 2005 (received August 23, 2005). The document recommends the following and I offer the ensuing comments:

SWMU 47, the Oily Wastewater Conveyance System: Alternative 2, Land use controls for subsurface soils exceeding residential scenario SCTLs is recommended. Restrictions will be for industrial use activities. I concur; however, I disagree with the discussion and the justification regarding natural attenuation for those soils. The use of natural attenuation as a remedy is justified only for groundwater or surface water. Please correct this discussion. Additionally, please confirm the residential (I assume) nature of the surface soils.

Alternative 2 for groundwater, Land Use Controls (LUCs) in the form of water use restrictions are recommended because natural attenuation "would likely address groundwater contamination...in a reasonable amount of time." A formal MNA status is not recommended, but I think the Navy should consider it. Does this discussion apply also to SWMU 53? Please address this.

SWMU 53, the Sewer Pipeline System: The same recommendation for soil at SWMU 47 is made for this SWMU as well. My comments for SWMU 47 apply here to SWMU 53 as well. The groundwater for SWMU 53 is covered with SWMU 47; please clarify the recommendations for each SWMU.

SWMU 55, the Storm Sewer System: The recommendation for NFA for surface soil, sediment and surface water appears reasonable; however, this SWMU is industrial in nature. Please confirm that all media meet the residential scenario criteria. Otherwise, LUCs may be more appropriate. Please add a clarifying (confirmatory) discussion for groundwater for this SWMU.

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Thank you for the opportunity to review this document. 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: Terry Hansen, Tetra Tech, Tallahassee  
Diane Racine, NAVSTA Mayport  
Tim Bahr, FDEP, Tallahassee

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