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LETTER AND U S NAVY RESPONSE TO COMMENTS REGARDING CORRECTIVE  
MEASURES STUDY FOR AREA OF CONCERN C NS MAYPORT FL

3/8/2007

TETRA TECH NUS



**TETRA TECH NUS, INC.**

8640 Phillips Highway, Suite 16 • Jacksonville, FL 32256  
Tel 904.636.6125 • Fax 904.636.6165 • www.tetrattech.com

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Project Number 112G00436

Commander, Southeast  
Naval Facilities Engineering Command  
ATTN: Ms. Adrienne Wilson (Code OPAEVR)  
Remedial Project Manager  
2155 Eagle Drive  
North Charleston, South Carolina 29406

Reference: CLEAN IV Contract Number N62467-04-D-0055  
Contract Task Order Number 0033

Subject: Response to Comments  
Corrective Measures Study, Revision 0  
Area of Concern (AOC) C  
Naval Station Mayport  
Mayport, Florida

Dear Ms. Wilson:

Tetra Tech NUS, Inc. (TtNUS) is pleased to submit this letter responding to the comments on the Corrective Measures Study (CMS) Revision 0 for AOC C from the various Naval Station (NAVSTA) Mayport Partnering Team members. The CMS for AOC C was submitted on November 30, 2006. The questions and/or comments that have been received by TtNUS from the other Partnering Team members are addressed below.

**CMS REVISION 0 COMMENTS**

**Florida Department of Environmental Protection**

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*Comments from Jim Cason*

1. **I have reviewed the above document dated November 2006 (received December 4, 2006). The document recommends MNA for the groundwater. I concur with that alternative. Please send a final, properly certified document.**

*RESPONSE:* Will comply. The final, properly certified version of the CMS will be submitted to you upon completion.



## Naval Facilities Engineering Command, Southeast

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*Comments from Adrienne Wilson*

1. **The CMS looks good. It appears the highest concentration of 1,1-DCE according to your data set is 14 ug/L. I agree with Diane's comments regarding the deed restrictions vs. the land use restrictions for non-brac properties.**

*RESPONSE:* Regarding the maximum concentration of 1,1-DCE, please see the response to the NAVSTA Mayport representative Diane Racine's Comment #1. Regarding "deed" restrictions vs. "land use" restrictions, please see the response to Diane Racine's Comment #6.

## Naval Station Mayport

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*Comments from Diane Racine*

1. **Page ES-3, Second paragraph – Please verify the concentrations for 1,1-dichloroethylene (DCE) in the first and second sentences.**

*RESPONSE:* After reviewing the data, it was determined that the maximum concentration of 1,1-DCE in the groundwater was 14 micrograms per liter ( $\mu\text{g/L}$ ), and that the Media Cleanup Standard (MCS) for 1,1-DCE was 7  $\mu\text{g/L}$ . The text in Rev. 1 CMS has been revised to reflect these concentrations, and global changes were applied throughout the CMS.

2. **Page 1-3, Second paragraph – Due to major reorganization, I would like to suggest revising the sentence to just list the services (i.e., infrastructure support; personnel support; facilities support; and ship and aircraft repair and maintenance).**

*RESPONSE:* Portions of the second and third sentences were deleted to combine the sentences so only the services are listed, as requested.

3. **Page 1-3, Section 1.3, First paragraph – Suggest that the second sentence be revised to "Full RCRA authority was delegated..." and "...issued the current RCRA operating permit including HSWA Corrective Action to NAVSTA..."**

*RESPONSE:* "Full RCRA" was inserted before "authority" at the aforementioned sentence in the Rev. 1 CMS. The text of the next sentence was revised to the suggested wording.

4. **Page 2-1, Section 2.1 – AOC C was initially identified only as the PCE spill and it was during investigation that the boundary was expanded. The partnering team reduced the boundary to the "original" location.**

*RESPONSE:* The original text was deleted and was replaced with text from the second paragraph on page ES-2 of the Rev. 0 CMS to accurately reflect the history associated with the AOC C boundary change.

5. **Page 2-1, Section 2.1, Third paragraph – Is the landfill mentioned in any other documents?**

*RESPONSE:* The portion of the sentence referring to the landfill was deleted from the Rev. 1 CMS.



6. **Page 4-4, Section 4.2.1.1 – Federal Government agencies do not have deed restrictions until the property is turned over to a non-federal government entity. Please change “deed” to “land use” restrictions.**

*RESPONSE:* Global edits were made throughout the Rev. 1 CMS changing “deed restrictions” to “land use restrictions”.

7. **Page 4-5, Section 4.2.1.1 – “Implementability” paragraph – same as comment #6.**

*RESPONSE:* Please refer to TtNUS' response to Comment #6.

8. **Page 4-9, Section 4.3.2.2 – Same as comment #6. Also remove sentence regarding the formal request to the well installation permit program. Existing potable water wells serve NAVSTA Mayport and internal program regulates well installation.**

*RESPONSE:* Please refer to the response to Comment #6. In addition, this sentence referring to the formal request for well installation was removed from the Rev. 1 CMS.

9. **Page 5-6 – “Control the Source of Releases” paragraph – typo in the second sentence.**

*RESPONSE:* The typo has been changes from “...And...” to “...and”.

If you have any questions regarding this correspondence or if I can be of assistance, please contact me at [Shina.Ballard@ttnus.com](mailto:Shina.Ballard@ttnus.com) or (904) 636-6125.

Sincerely,

A handwritten signature in cursive script that reads "Shina A. Ballard".

Shina A. Ballard  
Task Order Manager

SB/kw

Enclosure

c: Mr. J. Cason, FDEP  
Mr. C. Benedikt, USEPA  
Ms. D. Racine, NS Mayport  
Mr. M. Halil, CH2M Hill  
Mr. M. Perry, Tetra Tech NUS (unbound)  
Ms. D. Humbert, Tetra Tech NUS (w/o enclosure)  
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