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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT FINAL STATEMENT OF BASIS FOR SOLID WASTE
MANAGEMENT UNIT 25 NS MAYPORT FL
3/25/2008
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 25, 2008

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

RE: Statement of Basis, Solid Waste Management Unit 25 – Atlantic Marine, Inc., Naval Station Mayport, Mayport, Florida, Draft-Final Rev. 2

Dear Ms. Wilson:

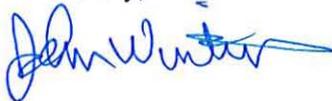
I have reviewed the subject document dated June 29, 2007 (received February 18, 2008). My comments concerning this Statement of Basis (SB) for Solid Waste Management Unit (SWMU) 25 are below.

1. **SWMU 25 Information, Page 1:** In the listing of the "Corrective Action" under the figure on this page it should read... "Soil – Capping and Land Use Controls; Groundwater – Land Use Controls".
2. **Summary, Page 1, Column 1:** In the second sentence of the first paragraph please insert the words "the former location of" before "Atlantic". This change should also be made in the **Facility Background Section** in the first sentence of the second paragraph.
3. **Summary, Page 1, Column 1:** The fifth sentence of the first paragraph should read... "LUCs will restrict the site to non-residential land use only, and will also prohibit any soil disturbance, excavation, or removal activities unless prior written approval is obtained from the NAVSTA Mayport Environmental Department in accordance with the NAVSTA Mayport excavation permit process."
4. **Summary, Page 1, Column 2:** The first sentence of the second paragraph should read "LUCs for groundwater will prohibit groundwater use/extraction, and will also prohibit any interference with groundwater monitoring systems at SWMU 25".
5. **Summary, Page 1, Column 2:** When discussing the COCs in groundwater please substitute the word "attenuation" for "degradation". This correction should also be made in the **Proposed Corrective Action, Summary of Alternatives, and Recommendations** sections.
6. **Proposed Corrective Action Page 2, Column 1:** The third sentence of the first paragraph should read... "Non-residential land use restrictions prohibit residential or residential like uses which includes, but is not limited to, any form of housing..."
7. **Proposed Corrective Action Page 2, Column 1:** Please review the present worth cost information in this Section for both soil and groundwater. Any corrections in the text should also be reflected in the Evaluation of Alternatives Tables.

8. **Proposed Corrective Action Page 2, Column 1:** Please change the second sentence in the second paragraph to read... "LUCs for groundwater will prohibit groundwater use/extraction, and would also prohibit any interference with groundwater..."
9. **Summary of Facility Risks, Page 3, Column 2:** Under the first full sentence of the second column please identify which concentration of dieldrin is surface and which is subsurface.
10. **Summary of Facility Risks, Page 3, Column 2:** Please reword the *Groundwater* description as follows: A comparison to FDEP Groundwater Cleanup Target Levels (GCTLs) concluded that antimony, arsenic, silver and zinc are COCs in groundwater for SWMUs 1, 23, 24, and 25. The human health risk assessment concluded that there are cancer and non-cancer risks to human health associated with hypothetical future residents. However, based on the current use of SWMU1, there is no human health exposure to groundwater, and it is unlikely that there will be any exposure during future use."
11. **Summary of Alternatives, Page 4, Column 2:** Under the *Soil Alternative 2* portion of this section the first sentence should read... "This alternative would implement LUCs to restrict the site to non-residential land use only, and it would also prohibit any unauthorized surface and subsurface soil disturbance."
12. **Summary of Alternatives, Page 4, Column 2:** Please substitute the word "unauthorized" for the word "uncontrolled" when discussing soil disturbances. This change should also be made in the **Recommendations Section**.
13. **Summary of Alternatives, Page 4, Column 2:** Under *Soil Alternative 4* Would LUCs need to be implemented in this alternative after an excavation is completed? Does the evaluation of this soil corrective measure change?
14. **Summary of Alternatives, Page 4, Column 2:** In the *Groundwater Alternative 2* paragraph the first sentence should be... "This alternative would impose LUCs in the form of a groundwater use/extraction prohibition, and it would also prohibit any interference with..."
15. **Recommendations, Page 5, Column 2:** The second sentence of the second paragraph should read... "LUCs would be implemented to prohibit any unauthorized surface and subsurface soil disturbance. They would also restrict the use of the parcel to non-residential, and would ensure that no unauthorized disturbance of asphalt or concrete covered area occurs."

Thank you for the opportunity to review this document. If you require additional clarification or other assistance please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.
Remedial Project Manager

JJC  ESN 

cc Tim Bahr, FDEP, Tallahassee
Diane Racine, NAVSTA Mayport