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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT FINAL STATEMENT OF BASIS FOR SOLID WASTE  
MANAGEMENT UNIT 17 NS MAYPORT FL

3/26/2008

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 26, 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 17 – Carbonaceous Fuel Boiler Area, Naval Station Mayport, Mayport, Florida, Draft-Final Rev. 3**

Dear Ms. Wilson:

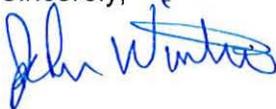
I have reviewed the subject document dated June 15, 2007 (received February 18, 2008). My comments concerning this Statement of Basis (SB) for Solid Waste Management Unit (SWMU) 17 are below.

1. **Summary, Page 1, Column 1:** In the first sentence please change "Land Use Control" to "Land Use Controls".
2. **Summary, Page 1, Column 1:** The third 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."
3. **Proposed Corrective Action Page 2, Column 1:** The second sentence of the first paragraph should read..."LUCs will be imposed to restrict the site to non-residential use only, and it would also prohibit any unauthorized soil disturbance in the vicinity...."
4. **Proposed Corrective Action Page 2, Column 1:** Please review the present worth cost information in this Section. Any corrections in the text should also be reflected in the Evaluation of Alternatives Tables.
5. **Summary of Facility Risks, Page 3, Column 1:** In the third paragraph under the Human Health Risk Assessment section please add "of 1" after "... FDEP's target Hazard Index (HI)".
6. **Summary of Facility Risks, Page 3, Column 2:** In the second paragraph of the *Groundwater Ecological Risk Assessment* discussion please provide more clarity as to why iron "was not expected to present unacceptable risk to aquatic receptors."
7. **Summary of Facility Risks, Page 3, Column 2:** Why is there a section called "Confirmatory Sampling"? Was a remedial action performed? For the soil sampling discussion please revise the first sentence to make this point clear. Please do the same in the groundwater portion of this section.

8. **Summary of Alternatives, Page 4, Column 1:** In the *Soil Alternative 2* paragraph the first two sentences should be... "This alternative would implement LUCs to restrict the site to non-residential land use only, and it would also prohibit any unauthorized soil disturbance. Non-residential land use restrictions prohibit residential or residential-like uses including, but not limited to, ..." This change should also be made in the **Recommendations Section** ("The preferred corrective action involves the implementation of LUCs to restrict the site to non-residential use only, and it would also prohibit any unauthorized soil disturbance at SWMU 17.").
9. **Summary of Alternatives, Page 4, Column 2:** Under *Soil Alternative 3* Would LUCs need to be implemented in this alternative after an excavation is completed? Does the evaluation of this soil corrective measure change?

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