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NS MAYPORT
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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING STATEMENTS OF
BASIS FOR SOLID WASTE MANAGEMENT UNITS 18, 20, 52 AND AREA OF CONCERN C
NS MAYPORT FL
7/14/2008
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 14, 2008

4SF-FFB

Mr. Dana Hayworth
NAVFAC SE
Naval Air Station Jacksonville
Building 135
P.O. Box 30
Jacksonville, FL 32212

SUBJECT: NAVSTA Mayport, Florida
EPA ID# FL9 170 024 260

Dear Mr. Hayworth:

The United States Environmental Protection Agency (EPA) has received (electronically) and reviewed the following documents:

- **Statement of Basis, SWMU 18 – Fleet Training Center (FTC) Diesel Generator Sump, Naval Station Mayport, Mayport, Florida, June 29, 2007 (Tetra Tech NUS, Inc.)**
- **Statement of Basis, SWMU 20 – Hobby Shop Drain Area and SWMU 21 – Hobby Shop Scrap Storage Area, Naval Station Mayport, Mayport, Florida, June 29, 2007 (Tetra Tech NUS, Inc.)**
- **Statement of Basis, SWMU 52 – Public Works Department (PWD) Service Station Storage Area, Naval Station Mayport, Mayport, Florida, June 29, 2007 (Tetra Tech NUS, Inc.)**
- **Statement of Basis, Area of Concern C – Building 191, Naval Station Mayport, Mayport, Florida, June 29, 2007 (Tetra Tech NUS, Inc.)**

Enclosed are EPA's review comments. The comments are separated into general comments which apply to all of the statements of basis, collectively, and specific comments which apply only to the referenced statements of basis.

If you should have any questions, please feel free to contact me at (404) 562-8555 or by email at Benedikt.Craig@epa.gov .

Sincerely,

A handwritten signature in black ink that reads "Craig A. Benedikt". The signature is written in a cursive style with a large initial "C".

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: John Winters, FDEP
Diane Racine, NAVSTA Mayport

**EPA Review Comments
Statements of Basis
For
SWMUs 18, 20, 21, 52 and AOC C
NAVSTA Mayport
Dated, June 29, 2007**

GENERAL COMMENTS:

1. Please add the EPA ID number to all of the statements of basis.
2. **Introduction, Page 1:** In the first sentence of the second paragraph, please change "...explains the related rationale, ..." to "...explains the rationale for its selection, ...".
3. In the third paragraph of the "Public Participation" section, please change the second sentence as follows: "To request a public hearing, to obtain more information about this SB, or to submit written comments, please contact Diane Racine or John Winters (contact information provided below)."

SPECIFIC COMMENTS:

SWMU 18:

1. **Summary, Page 1:** Please add that there is no surface water at SWMU 18.
2. **Summary of Facility Risks, Page 2:** In the second paragraph of the description of the "Human Health Risk Assessment", please provide a reference for the Soil Cleanup Target Levels (SCTLs).
3. **Summary of Facility Risks, Page 3:** Please provide a reference for the Florida Groundwater Cleanup Target Levels (GCTLs) referred to in the paragraph at the top of the page.
4. **Public Participation, Page 3:** Please change "James Cason" to "John Winters" throughout this section.
5. **Glossary, Page 4:** Please add the term "Aquifer" to the glossary. Please change "remedial action" to "corrective action" in the definition of "Statement of Basis".

SWMUs 20/21:

1. **Summary, Page 1:** Please add that there is no surface water at SWMUs 20 and 21.
2. **Proposed Corrective Action, Page 2:** Please change “remedy” to “corrective action” in this section.
3. **Summary of Facility Risks, Page 3:** Throughout this section, terms such as Florida soil cleanup goals, FDEP guidance concentration, Groundwater Cleanup Target Level and FDEP Soil Cleanup Target Level (SCTL) are used. A reference should be provided at the first instance each term is used in the document. In addition, please change “to exceed” to “that exceeded” in the third sentence of the “Groundwater” paragraph.
4. **Public Participation, Page 4:** Please change “James Cason” to “John Winters” throughout this section.
5. **Glossary, Page 5:** Please add the term “Aquifer” to the glossary.

SWMU 52:

1. **Summary, Page 1:** Please add that there is no surface water at SWMU 52.
2. **Summary of Facility Risks, Page 2:** In the second paragraph of the description of the “Human Health Risk Assessment”, please provide a reference for the Soil Cleanup Target Levels (SCTLs).
3. **Summary of Facility Risks, Page 3:** Please provide a reference for the Florida Groundwater Cleanup Target Levels (GCTLs) referred to in the second full paragraph in the first column.
4. **Public Participation, Page 3:** Please change “James Cason” to “John Winters” throughout this section.
5. **Glossary, Page 4:** Please add the term “Aquifer” to the glossary. Please change “remedial action” to “corrective action” in the definition of “Statement of Basis”.

Area of Concern C:

1. **Proposed Corrective Action, Page 2:** Please change the cost information to the previously agreed upon language.

2. **Facility Background, Page 2:** Please delete the last sentence of this section in the second column as the deliberations of the partnering are not relevant to this section. In addition, partnering team meeting minutes are not a required component of the administrative record.
3. **Summary of Facility Risks, Page 3:** Please change the description of the surface water in the “Ecological Assessment” as follows: “The screening level ecological risk assessment concluded that no detected chemical in surface water or sediment had a hazard quotient greater than 1.0, which indicates that no adverse ecological risks exist.”
4. **Scope of Corrective Action, Page 3:** Please change the word “consumptive” to “potable” in the second sentence of the first paragraph.
5. **Summary of Alternatives, Page 3:** Please provide a reference for the “RCRA Corrective Action Guidance” discussed in the first paragraph.
6. **Evaluation of the Proposed Remedy and Alternatives, Page 4:** Please change the name of this section to “Evaluation of the Proposed Corrective Measure and Alternatives”. In addition, please add the word “guidance” between the words “Plan” and “USEPA” in the first paragraph of this section.
7. **Table 1, Page 4:** Please indicate that the cost information presented is the net present worth cost over a 30-year period.
8. **Recommendations, Page 5:** Please change the word “consumptive” to “potable” in the second paragraph of this section.
9. **Glossary, Page 4:** Please add the term “Aquifer” to the glossary. Please change “remedial action” to “corrective action” in the definition of “Statement of Basis”.