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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION ON RESPONSE TO COMMENTS REGARDING STATEMENTS OF BASIS FOR  
SOLID WASTE MANAGEMENT UNITS 1, 17, 23, 24 AND 25 NS MAYPORT FL  
9/16/2008  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

September 16, 2008

Mr. Dana Hayworth  
Department of the Navy  
Naval Facilities Engineering Command Southeast  
Naval Air Station Building 135  
Post Office Box 30  
Jacksonville, Florida 32212

**RE: Response to Comments for the Statements of Basis for Solid Waste Management Units 1, 17, 23, 24, and 25, Naval Station Mayport, Mayport, Florida (Tetra Tech NUS, Inc., Aug 8, 2008).**

Dear Mr. Hayworth:

I have provided follow-up responses to you based on the comments that I received on August 11, 2008 from Tetra Tech NUS, Incorporated (Tetra Tech) and the United States Navy (Navy) concerning the subject document and my initial comments to this document. I have partially duplicated these responses by Tetra Tech and the Navy and followed that with my additional follow-up response below. This should complete the administrative record pertaining to these documents.

## **SWMU 1 Statement of Basis Comments**

**Tetra Tech and Navy Response to Comment #1:** The language regarding land use controls (LUCs) has been changed to indicate LUC requirements for both surface and subsurface soils. Additional information regarding the likelihood of contaminants leaching from soil to groundwater is more appropriately detailed in the Final Corrective Measures Study for Solid Waste Management Units (SWMUs) 1, 23, 24, and 25 (November 2004).

**Follow-up Response #1:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #2:** Will comply.

**Follow-up Response #2:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #3:** Will comply.

**Follow-up Response #3:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #4:** Will comply.

**Follow-up Response #4:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #5:** Will comply.

**Follow-up Response #5:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #6:** Will comply.

**Follow-up Response #6:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #7:** Per communications with various members of the NAVSTA Mayport Partnering Team, the language regarding the present worth cost information will be changed. The text will be restated...

**Follow-up Response #7:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #8:** Will comply.

**Follow-up Response #8:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #9:** Will comply.

**Follow-up Response #9:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #10:** Will comply.

**Follow-up Response #10:** The response is satisfactory.

#### **SWMU 17 Statement of Basis Comments**

**Tetra Tech and Navy Response to Comment #1:** Will comply.

**Follow-up Response #1:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #2:** Will comply.

**Follow-up Response #2:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #3:** Will comply.

**Follow-up Response #3:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #4:** Per communications with various members of the NAVSTA Mayport Partnering Team, the language regarding the present worth cost information will be changed. The text will be restated...

**Follow-up Response #4:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #5:** Will comply.

**Follow-up Response #5:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #6:** The following text will replace the existing text in the "Ecological Assessment" section for groundwater: "The concentrations of iron in groundwater at SWMU 17 (2000 ug/L) exceeded both the State of Florida GCTL of 300 ug/L and the Marine Surface Water Cleanup Target Level of 300 ug/L. Upgradient groundwater monitoring wells have significantly higher iron concentrations (4000 ug/L). The iron concentrations decrease as groundwater flows toward the NAVSA Mayport Turning Basin. The CFB at the SWMU was fueled by domestic solid waste and burned waste oil collected from various locations at NAVSATA Mayport. This data indicates that iron is not a SWMU-related contaminant."

**Follow-up Response #6:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #7:** "Confirmatory Sampling" has been removed from the title of this section. There was no remedial action performed at his SWMU. The soil sampling discussion and the groundwater portion of this section have been relocated to provide further clarity.

**Follow-up Response #7:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #8:** Will comply.

**Follow-up Response #8:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #9:** No, LUCs would not be required after the Excavation and Disposal are completed. Therefore, mention of LUCs in the evaluation of this soil corrective measure has been removed.

**Follow-up Response #9:** The response is satisfactory.

#### **SWMU 23 Statement of Basis Comments**

**Tetra Tech and Navy Response to Comment #1:** Will comply.

**Follow-up Response #1:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #2:** Will comply.

**Follow-up Response #2:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #3:** Will comply.

**Follow-up Response #3:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #4:** Will comply.

**Follow-up Response #4:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #5:** Will comply.

**Follow-up Response #5:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #6:** Will comply.

**Follow-up Response #6:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #7:** Per communications with various members of the NAVSTA Mayport Partnering Team, the language regarding the present worth cost information will be changed. The text will be restated...

**Follow-up Response #7:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #8:** Will comply.

**Follow-up Response #8:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #9:** In an effort to verify whether or not the two underground storage tanks exist at SWMU 23, the data contained in the December 1996 RFI and the November 2004 CMS were reviewed. In the discussions in Chapter 4 of the RFI, the text states that "two underground storage tanks with a combined capacity of 3,000 gallons may exist near the location of the machine shop (Building 15). The tanks were used in the 1960s and may have been removed in 1972 during construction of the machine shop (from the 1989 RFA). No reports have been found concerning the condition of the tanks at removal or if environmental samples were collected during removal of the tanks."

Based upon a review of the background information in the RFI, it is inconclusive if the two tanks were abandoned in place or completely removed from this location. Therefore, the text in the Final SB for SWMU 23 will be revised to remove the confusion.

**Follow-up Response #9:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #10:** Will comply.

**Follow-up Response #10:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #11:** Will comply.

**Follow-up Response #11:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #12:** Will comply.

**Follow-up Response #12:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #13:** Will comply.

**Follow-up Response #13:** The response is satisfactory.

**SWMU 24 Statement of Basis Comments**

**Tetra Tech and Navy Response to Comment #1:** This comment will not be incorporated into the document since it has been confirmed that the North Florida Shipyards, Inc. is still in service. The previous mention of the word "former" has been removed from the text in both the Summary and Facility Background sections of the document.

**Follow-up Response #1:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #2:** Will comply.

**Follow-up Response #2:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #3:** Will comply.

**Follow-up Response #3:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #4:** Will comply.

**Follow-up Response #4:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #5:** Will comply.

**Follow-up Response #5:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #6:** Per communications with various members of the NAVSTA Mayport Partnering Team, the language regarding the present worth cost information will be changed. The text will be restated...

**Follow-up Response #6:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #7:** Will comply.

**Follow-up Response #7:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #8:** This comment will not be incorporated into the document since it has been confirmed that the North Florida Shipyards, Inc. is still in service. The previous mention of the word "former" has been removed from the text in both the Summary and Facility Background sections of the document.

**Follow-up Response #8:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #9:** Will comply.

**Follow-up Response #9:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #10:** Will comply.

**Follow-up Response #10:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #11:** Will comply.

**Follow-up Response #11:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #12:** Will comply.

**Follow-up Response #12:** The response is satisfactory.

**SWMU 25 Statement of Basis Comments**

**Tetra Tech and Navy Response to Comment #1:** Will comply.

**Follow-up Response #1:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #2:** Will comply.

**Follow-up Response #2:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #3:** Will comply.

**Follow-up Response #3:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #4:** Will comply.

**Follow-up Response #4:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #5:** Will comply.

**Follow-up Response #5:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #6:** Will comply.

**Follow-up Response #6:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #7:** Per communications with various members of the NAVSTA Mayport Partnering Team, the language regarding the present worth cost information will be changed. The text will be restated...

**Follow-up Response #7:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #8:** Will comply.

**Follow-up Response #8:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #9:** Will comply.

**Follow-up Response #9:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #10:** Will comply.

**Follow-up Response #10:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #11:** Will comply.

**Follow-up Response #11:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #12:** Will comply.

**Follow-up Response #12:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #13:** Mention of LUCs as a component of this alternative has been removed as LUCs would not be required if soil is excavated and disposed. Appropriate changes have also been made in Table 1 in the column summarizing soil Alternative 4.

**Follow-up Response #13:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #14:** Will comply.

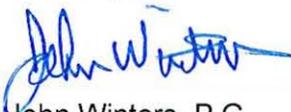
**Follow-up Response #14:** The response is satisfactory.

**Tetra Tech and Navy Response to Comment #15:** Will comply.

**Follow-up Response #15:** The response is satisfactory.

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  for  ESN 

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