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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT CORRECTIVE MEASURES STUDY ADDENDUM FOR
SOLID WASTE MANAGEMENT UNITS 6 AND 7 NS MAYPORT FL
5/15/2009
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

May 15, 2009

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

RE: Draft Corrective Measures Study Addendum, Solid Waste Management Units 6 and 7, Naval Station Mayport, USEPA ID #FL9 170 024 260, Mayport, Florida, (Tetra Tech NUS, Incorporated, March 2009)

Dear Mr. Syme:

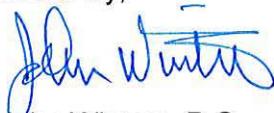
I have reviewed the subject document dated March 2009 (received March 11, 2009). My comments concerning this Corrective Measures Study (CMS) Addendum are below.

- 1. 1.5 CMS METHODOLOGY, Page 1-6:** Please change the selection process of COPCs (contaminants of potential concern) to fit with the State of Florida's regulatory requirements (not EPA's requirements) and Rule 62-780. For example, occurrence, or low frequency of detection, is most likely not a reason to not include a COI (contaminant of interest) in the COPC list. FDEP does have exceptions for soil contamination which includes the use of 95 % UCL. Also, in upcoming sections of this document, there is an associated sentence that must be changed/rewritten: "The list of COIs was also screened to eliminate common laboratory contaminants, to eliminate samples of poor quality or which provided spurious results, and on the basis of low frequency of detection (less than 5 percent)." Low frequency of detection should not be used to eliminate contaminants from the list. Others being removed should have appropriate documentation to show that it should not be added to the COPC list, and their reasons should be written into the text.
- 2. 2.4 BACKGROUND SCREENING VALUES FOR NAVSTA MAYPORT, Page 2-6:** Please note that the Department has recently issued a guidance document for Comparing Background and Site Chemical Concentrations in Soil (March 2008). There are non-statistical and statistical approaches that the department is currently allowing. In the future, please use and reference this document when determining background concentration values for contaminants at our sites. Currently, a minimum of seven background samples are needed to use a non-statistical approach for comparing site to background data. In several of the background tables it seems that less than seven samples were used quite often. Please explain.

3. **2.5.2.2 RFI Human Health Risk Assessment Conclusions, Page 2-14:** Please compare the cancer and non-cancer risks to the State of Florida's risk criteria in this section for both of these conclusions.
4. **3.3.1 COC Summary, Page 3-7:** Please correct the typo located in Table 3-5 that says the media cleanup standard for TPH is 47,000. It should be 5,000. Also, please add the units to this table as well.
5. **4.3.2 Alternative 2: Monitored Natural Attenuation and LUCs, Page 4-8:** Please explain why only eight monitoring wells are being proposed for a monitoring well network during MNA? Figure 3-1, Groundwater Exceedences, shows thirteen wells in and downgradient of SWMUs 6 and 7 that were being sampled and/or evaluated for this Corrective Measures Study Addendum. FDEP believes all thirteen should be in the monitor well network. This needs to be discussed.

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