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LETTER AND U S NAVY RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION COMMENTS REGARDING CORRECTIVE MEASURES STUDY ADDENDUM
FOR SOLID WASTE MANAGEMENT UNITS 6 AND 7 NS MAYPORT FL

6/12/2009
TETRA TECH NUS



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June 12, 2009

Project Number 112G00436

Naval Facilities Engineering Command, Southeast
ATTN: Mr. Brian Syme (OPC 6)
Remedial Project Manager
135 Ajax Street North, Building 903
Naval Air Station Jacksonville
Jacksonville, FL 32212-0030

Reference: CLEAN IV Contract Number N62467-04-D-0055
Contract Task Order Number 0033

Subject: Response to Comments, Corrective Measures Study Addendum for
Solid Waste Management Units 6 and 7
Naval Station Mayport, Jacksonville, Florida

Dear Mr. Syme:

Tetra Tech NUS, Inc. (TtNUS) is pleased to submit this letter responding to the comments on the Corrective Measures Study (CMS) Addendum for Solid Waste Management Units (SWMUs) 6 and 7 at Naval Station (NAVSTA) Mayport. The questions and/or comments received by TtNUS are addressed below.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION, John Winters, P.G.

Comment 1: 1.5 CMS METHODOLOGY, Page 1-6: Please change the selection process of COPCs (contaminants of concern) to fit with the State of Florida 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 (contaminants 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.

Response: Agreed. The text has been revised to remove any reference to EPA requirements. Additionally the EPA MCLs were removed from Table 3-3. Sentences containing references to elimination of COI based on low frequency of detection or poor quality samples has been removed from the report. No COI were eliminated based on these criteria.



Comment 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.

Response: The site background concentrations referenced in the report were originally developed for inclusion in the 1995 *RCRA Facility Investigation (RFI) General Information Report (GIR) for Naval Station Mayport, Florida* prepared by ABB Environmental Services, Inc, and were revised by Tetra Tech NUS, Inc. in 2000. These background concentrations were established prior to the release of the March 2008 FDEP guidance. Future background concentrations will be established based on the new FDEP guidance.

Comment 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.

Response: Agreed. The text has been changed as to reflect that the excess lifetime cancer risk (ELCR) and non-cancer Hazard Index were compared to the State of Florida's risk criteria.

Comment 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.

Response: Agreed. The media cleanup standard for TPH has been changed to 5,000 µg/L. The units for the groundwater concentrations were included on the original Table 3-5 on column 1 row 2. Units have been added to two additional locations on the table to make them more visible.

Comment 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 Exceedances, shows thirteen wells in and downgradient of SWMUs 6 and 7 that were sampled and/or evaluated for this Corrective Measures Study Addendum. FDEP believes all thirteen should be in the monitoring well network. This needs to be discussed.

Response: Four of the thirteen monitoring wells with groundwater concentrations greater than FDEP GCTLs sampled for the CMS addendum were abandoned during an Interim measure (IM) conducted to remove contaminated soil and free product at SWMU 6 and 7. The report has been revised to indicate that all of the remaining wells will be included in the monitoring well network to be sampled and the four monitoring wells abandoned during the IM will be replaced with new wells.



TETRA TECH NUS, INC.

Mr. Brian Syme
NAVFAC SE
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If you have any questions with regard to this submittal, please contact me via e-mail at joe.gibson@tetratech.com or by phone at (904) 730-4669, Extension 215.

Sincerely,

A handwritten signature in cursive script that reads "Joseph L. Gibson".

Joseph Gibson
Task Order Manager

JG

Enclosure

c: John Winters FDEP
Diane Racine, NAVSTA Mayport
Casey Hudson, CH2M Hill
Mark Perry, TtNUS
Debra Humbert, TtNUS
CTO 0033 Project File