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LETTER AND CONCURRENCE FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FINAL RCRA FACILITY INVESTIGATION ADDENDUM SOLID  
WASTE MANAGEMENT UNITS 44 AND 45 (SWMU44) (SWMU45) NS MAYPORT FL  
8/22/2012  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

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Herschel J. Vinyard Jr.  
Secretary

August 22, 2012

Naval Facilities Engineering Command Southeast  
Attn: Mr. Dana Hayworth (OPUE3)  
135 Ajax Street North, Building 135  
Naval Air Station Jacksonville  
Jacksonville, Florida 32212-0030

**RE: Final Resource Conservation and Recovery Act Facility Investigation  
Addendum, SWMUs 44 and 45, Naval Station Mayport, USEPA ID #FL9 170  
024 260, Mayport, Florida (Tetra Tech, July 30, 2012)**

Dear Mr. Hayworth:

I have reviewed the subject document which was dated July 30, 2012 and was received on July 31, 2012. This report was prepared under Contract Task Order Number 0033. According to the document *"The objectives of the supplemental sampling events were taken from the RFI Work Plan Addendum (Work Plan), dated December 19, 2006 (Tetra Tech, 2006), which addressed the first sampling event. These objectives are to provide data that would be used for the following: 1) Delineate surface and subsurface soil contamination within and around the SWMUs in excess of Florida Department of Environmental Protection (FDEP) Residential Direct Exposure Soil Cleanup Target Levels (SCTLs). The data will be used to determine appropriate land use control (LUC) boundaries at the SWMUs, 2) Delineate (vertically and horizontally) total recoverable petroleum hydrocarbon (TRPH)-contaminated soil within and around the SWMUs that have or have had light nonaqueous phase liquid (LNAPL) present, and 3) Evaluate the potential presence of groundwater contamination."* The report goes on to state *"The results presented in this RFI Addendum, as well as pertinent historical data, will provide the basis for a Corrective Measures Study (CMS) for SWMUs 44 and 45."*

In the Conclusions and Recommendations section of this report it states *"The soil quality data associated with SWMUs 44 and 45 were compared against the Residential Direct Exposure SCTLs, and an area of inferred soil contamination was developed for SWMU 44 (see Figure 3-1) and SWMU 45 (see Figure 3-2). The concentrations of analytes within the areas are in excess of the Residential Direct Exposure SCTLs and are similar to the concentrations detected and reviewed in the RFI (see Appendix A, Table 4-4)." The report goes on to state "This suggests that vertical migration of TRPH and the six PAHs from the surface soils to the subsurface soils at SWMU 44 may not be occurring. The groundwater data further support the findings from*

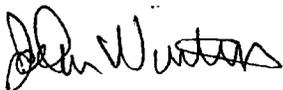
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*the subsurface soil sampling and analysis, as no PAHs were detected in groundwater, and TRPH was not detected at concentrations greater than its GCTL. Therefore, contaminated soil does not appear to be a continuing source of contamination that affects groundwater quality." The final conclusion presented in this report is "Arsenic was detected at concentrations greater than its GCTL in the groundwater samples collected from SWMU 44. It was also detected at concentrations greater than its GCTL in the groundwater samples collected from SWMU 45." The recommendation in the report states "Based upon the findings associated presented [sic] within this RFI Addendum, it is recommended that a CMS be prepared to address the areas of soil contamination and the arsenic groundwater contamination associated with SWMUs 44 and 45."*

While I'm not in agreement with the leachability argument presented in Tetra Tech's conclusions (TRPH and the six PAHs, and possibly others, are leaching through the subsurface and into the groundwater. They just aren't leaching in quantities above their cleanup target levels), I am in concurrence with the stated recommendation in this RFI Addendum, which is to proceed to a CMS to address the soil and groundwater contamination at these Solid Waste Management Units (SWMUs). I am also in concurrence with the Tetra Tech's response to my comment to the Draft Final RFI Addendum which is dated July 30, 2012. Their response states "*Per agreements in the Partnering Team meetings (including the July 24 and 25, 2012 meeting), Tetra Tech will collect additional samples to complete the soil contamination delineation. This information will be added to the CMS and included in the corrective action strategy. The RFI Addendum will be issued final with no changes to the draft-final (Rev. 0) version. Final covers and spines will be sent to Team members. Additionally, the certification page was omitted from the draft-final version of the RFI Addendum for SWMUs 44 and 45 and will be included in the final cover and spine of the document.*"

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  
Federal Programs Section



cc Tim Bahr, FDEP, Tallahassee