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U S NAVY RESPONSES TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE DRAFT FINAL STATEMENTS OF BASIS FOR SOLID WASTE
MANAGEMENT UNITS 19, 26, 28 AND 56 NS MAYPORT FL
11/12/2013
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Project Number 112G00436

Naval Facilities Engineering Command, Southeast
ATTN: Mr. Dana Hayworth (OPC 6)
Remedial Project Manager
135 Ajax Street North
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, Draft-Final Statements of Basis for Solid Waste Management
Units 19, 26, 28, and 56 at Naval Station Mayport, Jacksonville, Florida

Dear Mr. Hayworth:

Tetra Tech, Inc. is pleased to submit this letter responding to the comments on the Draft-Final Statements of Basis for Solid Waste Management Units (SWMUs) 19, 26, 28, and 56 at Naval Station (NAVSTA) Mayport. The questions and/or comments received by Tetra Tech are addressed below.

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION, Mr. John Winters

SWMU 19: SWMU 19, Facility Background Section, Page 2, Column 2: Please revise/update the leachability discussion in the second paragraph to better explain to the reader that these contaminants are not leaching to groundwater even though they are above their FDEP default leachability cleanup criteria level.

Response: Paragraph changed to read as follows, "The detected concentrations of analytes for each environmental medium were compared to FDEP Cleanup Target Levels (CTLs) (Chapter 62-777, Florida Administrative Code) for surface soil, subsurface soil, and groundwater, as appropriate. This comparison showed three contaminants (chlorobenzilate, endrin ketone, and cyanide) have the potential to leach from the soil and impact groundwater and surface water. However, there were no detectable levels of chlorobenzilate, endrin ketone, or cyanide in the groundwater samples collected from nearby monitoring wells. Therefore, these constituents will not be COCs due to leachability. No contaminants in surface or subsurface soil samples exceeded FDEP residential direct-exposure soil CTLs or NAVSTA Mayport Background Screening Values. No contaminants were selected as COCs for soil or groundwater."

SWMU 26: The Department concurs with the Statement of Basis for this SWMU.

Response: No response necessary; the document was not changed.

SWMU 28: SWMU 28, Facility Background Section, Page 2, Column 2: Please revise/update the benzo(a)pyrene subsurface soil discussion in the second paragraph. In one part of the paragraph



benzo(a)pyrene is the contaminant above its SCTL and then benzo(a)pyrene equivalents are mentioned later in the paragraph.

Response: Sentences were changed as follows, "Benzo(a)pyrene equivalents exceeded SCTLs for residential direct exposure in the subsurface soil. A confirmatory soil sample was collected in March 2007 to verify the 1994 results. The subsurface soil sample did not exceed the FDEP SCTLs for residential direct exposure for benzo(a)pyrene equivalents."

SWMU 56: SWMU 56, Facility Background Section, Page 2, Column 2: Please revise/update the background screen values discussion in the third paragraph. Additional information should be given in this paragraph concerning the NAVSTA Mayport Background Screening Values document and the acceptable background levels for iron and manganese.

Response: The paragraph was revised to include the following, "The NAVSTA Mayport Background Screening Values (BSVs) were calculated and approved by FDEP in their letter dated April 16, 2001, based upon naturally-occurring conditions in the soil and groundwater. The groundwater samples, which exceeded FDEP GCTLs, did not exceed the NAVSTA Mayport BSVs for iron and manganese."

If you have any questions with regard to this submittal, please do not hesitate to contact me at (904) 730-4667, extension 215, or via e mail at Gregory.Roof@TetraTech.com.

Sincerely,

Gregory S. Roof, P.E.
Project Manager

GRS/df

Enclosure

c: John Winters, FDEP (electronic only)
Paul Malewicki, NAVSTA Mayport (1 hardcopy, 1 CD)
Debra Humbert, Tetra Tech (1 unbound, 1 CD)
RDM, Tetra Tech (1 unbound, 1 CD)
Administrative Record (electronic only)
CTO 0033 Project File