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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION REGARDING INITIAL ASSESSMENT STUDY NS MAYPORT FL
8/4/1986
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

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STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

1195

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

August 4, 1986

Mr. James Malone
P.O. Box 10068 Code 1142
Charleston, South Carolina 29411-0068

Dear Mr. Malone:

I have enclosed the department's technical review comments for the NACIP Initial Assessment Study, Naval Station, Mayport, Florida. The memorandum expresses the concerns of both the Northeast District Office and our Technical Project Support Section in Tallahassee.

Since the NACIP is designed to assure a comprehensive assessment and control of the migration of environmental contamination, inclusion of our comments should assist in this goal. If you have any further questions regarding this matter, please contact me at 904/488-0190.

Sincerely,

Eric S. Nuzie
Environmental Supervisor

ESN/ke

Enclosure

cc: Wayne R. Mathis
Mike Fitzsimmons

INTEROFFICE MEMORANDUM

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TO: Eric Nuzie, Bureau of Operations

THROUGH: John Gentry, Bureau of Operations *JG*

FROM: James J. Crane, Bureau of Operations *JJC*

DATE: July 18, 1986

SUBJECT: Initial Assessment Study, Naval Station, Mayport,
Florida, May 1986

I've reviewed the subject document and offer these comments for your consideration. Generally, I agree with the need for confirmation studies at all of the sites for which confirmation was recommended by Environmental Science and Engineering. I, however, do not agree with the recommendations of no confirmation studies at several of the other sites.

I agree that the following sites should be included in the confirmation study phase: Site 1 (Landfill A), Site 2 (Landfill B), Site 4 (Landfill D), Site 5 (Landfill E), Site 6 (Landfill F), Site 8 (Waste Oil Pit), Site 9 (Fuel Spill Area) and Site 14 (Mercury/Oil Waste Spill Site). I agree with the rationale for deleting Site 3 (Landfill C) and Site 7 (Hazardous Waste Storage Area), Site 10 (DRMO Storage Area) and Site 12 (Oily Waste Pipeline). I do not agree, based on the reasons cited, that Site 11 (Neutralization Pond), Site 13 (Old Fire Fighting Training Area), Site 15 (Old Pesticide Area) and Site 16 (Transformer Storage Yard) should be omitted from confirmation studies. Perhaps further discussions with the consultants at a meeting may provide further information by which I can support their recommendation of no action at the above sites.

I agree with the majority of the recommendations proposed in Chapter 3 for the confirmation studies. However, I think groundwater should also be analyzed at Site 14 (Mercury/Oily Waste Spill Site) for PCB's, purgeable organics and the priority pollutant metals.

If you have any questions, please discuss them with me at your convenience.

JJC/cs

NAVAL STATION, MAYPORT, FLORIDA

Southern Division, Naval Facilities Engineering Command
EIC - Barry Lester A/V 563-5510 FTS 573 - 5510

Performing the Confirmation Study will be: Mr. David Troutman, Mr. John Dumeyer, and Mr. Tony Allen of E. C. Jordan Co., Tallahassee, FL,
(904) 656-1293

NACIP PROGRAM

The Department of the Navy developed the NACIP Program to identify, assess, and control environmental contamination from past use and disposal of chemicals and other materials. The NACIP Program is part of the Department of Defense (DOD) Installation Restoration Program which satisfies requirements of the "Superfund" Program, authorized by the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, for DOD installations. The NACIP Program consists of three phases with the decision to proceed from one phase to the next depending upon the results of the previous phase. The three phases are:

Phase I Initial Assessment Study (IAS) - collecting and evaluating all evidence which indicates the existence of pollutants which may have contaminated a site or pose an imminent health hazard for people located on or off the installation.

Phase II Confirmation Study (CS) - performing field investigations, including physical and analytical monitoring, to confirm or deny contamination or a health hazard and to quantify the extent of any problem which may exist. The CS is further subdivided into two steps:

Verification - verifying whether contamination exists from past waste disposal practices.

Characterization - quantifying and qualifying the extent of any contamination found during verification.

Phase III Corrective Measures - instituting needed remedial measures to control and mitigate contamination.

The Verification Phase Field Work of the NACIP Program is expected to begin in ~~December 1986~~.

JAN 1987

NAVSTA Status

IAS - completed May 1986 - 16 sites investigated
8 sites recommended for Confirmation

CS - Verification - development of Work Plan underway
(comments by FDER and EPA may require additional site to be included)

Public Relations

I. A Discussion of Approach.

If at all possible, avoid dealing directly with the press. Make sure the Public Affairs Officer (PAO) on the base is briefed on the NACIP Program and the IAS. He should be aware of the types of information and time frames that may be involved in the IAS. If the press contacts you, or the environmental point of contact (POC) directly, first refer them to the PAO for information. For support on technical questions, the PAO should have the NAVENENVSA representative (and the contract team leader) participate in press interviews.

Items to remember during interviews:

A. Reporters are intelligent, experienced interviewers. They can tell when you're trying to hide something. It's their job to try to get people to say things they don't want to say.

B. Remember the press has come for a story. Keep your answers clear and short--talk in headlines. Be a "30-second person." Then your whole quote is more likely to be used.

C. Keep cool. Do not let the press's questions irritate you. Never consider a question too naive.

D. Designate one or two members of the team as media representatives, with only one person as spokesperson on the scene. This ensures that the team speaks with one voice, but that backup coverage is available if needed.

E. The PAO should designate one location for reporters and photographers. This will keep them all in one place where briefings can be held to deal with their questions. Operations within a naval air rework facility or a shipyard can be dangerous to those (such as the reporters) without proper safety equipment, not to mention appearing hazardous, i.e., a plating shop or a paint-stripping hangar.

F. At press briefings, the spokesperson should provide simple, factual information about the study. Be honest, and if you do not know the answer to a question, do not guess. Tell the reporter that you do not know, but that you will try to find out. Then do so.

G. Information should be presented in a straightforward manner. If you tell a reporter that a tank car is leaking vinyl chloride monomer through a hole the size of a dinner plate, or that the end of a chlorine cylinder looks, for all the world, like a smiling golf ball, you can be fairly sure that your colorful description will be reported. Such descriptions may be accurate, but they might also give the media a signal to sensationalize their reports. Instead, limit your descriptions to the simple facts.

H. As the team spokesperson assesses a situation, before meeting with the press, he or she may want to take notes to prepare responses for reporters' questions. List relevant answers (if you know) to the following questions. What happened? When did it happen? Why did it happen? Do not speculate.

I. Key facts should be related to reporters in lay terms. Do not attempt to be overly technical, because that can lead to confusion. Most news reporters are generalists with no technical backgrounds. They may feel inhibited about asking for clarifications, because they do not want to appear ignorant. Remember, they are acting as your bridge between technology and the general public.

J. When talking about who is involved, emphasize that the base is cooperating with the study. Emphasize the length of time these studies have been happening. Describe the nature of physical damage, but do not make dollar-amount estimates. Tell them you intend to allow insurance adjusters to set monetary determinations. When these determinations have been made, you will be able to release the figures.

K. If an accident or a site poses a health or environmental hazard to the surrounding area, tell reporters what is being done to minimize the threat. The explanation should include a brief description of the chemical's properties including why it is hazardous.

L. Reporters also may want to know your prediction of when the problem will be cleaned up. Avoid setting deadlines.

M. Most of all, the press has come for a story, no matter what. Keep your answers clear and short--talk in headlines.

N. Reporters do not necessarily work with the "truth" (whatever that may mean). What they work with is the best available information. Available is the key word.

O. It is easy to blame the media for distorting news about a chemical emergency, but if distortion does occur, at least some fault usually lies with those who should have provided information. Inattention to reporter's needs--such as delays in talking to them, refusal to discuss pertinent facts, and the traditional "no comment" response--all can contribute to distortion in a news account.

¹Most of the points in this section are taken from Walker, J. L., "Dealing With the Media in a Chemical Emergency", Chemical Engineering, December 27, 1982, p. 61-62

II. Typical Press Questions and Responses.

Typical press questions include:

Q. What is the NACIP Program?

A. The Navy has one of our country's most active environmental protection programs. Our study is to ensure the Navy does not have any current or potential future hazardous waste disposal problems.

Q. Why are you doing a NACIP study here?

A. Studies are being done at all Navy activities that have industrial operations or that formerly had industrial operations.

Q. Why hasn't this base been studied under the NACIP Program before?

A. Those bases with known problems or the strong possibility of problems were done first.

Q. Have you found any abandoned hazardous waste disposal sites?

A. Navywide, we have been finding very few problems. Although our efforts are still underway, we certainly haven't found any environmental hazards of the magnitude requiring immediate attention.

Q. What type of problems do you think you'll see at this base?

A. We know that this base had an (x) operation, and used (a, b, c) chemicals/oils. We don't know if there was a problem with disposal with these wastes.

Q. What operations would produce most of the wastes that may pose a problem?

A. We know that this base has (x, y, z) operations. We don't know yet that there is a problem. That is why we have to talk to long-time base personnel and retirees who used to work here.

Q. If your study shows a problem does exist on the base, when will it be cleaned up?

A. The Navy has funds set aside and is prepared to take immediate action in the very rare case where an imminent health hazard is uncovered. In most cases, however, there is enough time to properly analyze the situation and take whatever action is necessary.

Q. If it isn't an imminent health hazard, when will other problems be cleaned up?

A. We don't know exactly. The next phase of the program will sample sites identified, to see if the site is a problem, and if so, how large a problem it is. If there is a problem, the site will then be cleaned up.

Q. Is it true that you had to condemn the base nursery school and move the children elsewhere because they may have become contaminated with toxic pesticides used in that building and in the adjacent playground?

A. In the survey, we did discover that that facility, in the past, had been used in the handling of pesticides. To be on the safe side, we have opened up a new nursery school at a better site.

Q. What are you going to do about the children that went to this school that may be contaminated?

A. We don't know that there is a problem. Samples of the area haven't been taken yet. Once the samples are analyzed, further action will be taken, if needed.

Q. Can you show us some of the sites you've found so far on base?

A. We can't. The sites have yet to be verified; that's what we're doing this week.

Q. What about Superfund sites?

A. We don't know yet if they're a problem. As a part of this study, we'll collect information on these sites, also.

Q. But these sites were identified as contaminated areas, how can you say there may not be a problem?

A. We've found in the past that some people have been overzealous in identifying these areas. EPA representatives have admitted that many identified sites are not a problem.

Q. So at the end of the week, you can say how many sites were identified?

A. No, we can't. Information from this week's interviews must be compared to the other information we've found in old records, maps, and aerial photos, and then be interpreted.