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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT INTERIM
MEASURES WORK PLAN FOR SOLID WASTE MANAGEMENT UNITS 6 AND 7 NS
MAYPORT FL
7/26/1994
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

NAVSTA Mayport Administrative Record
Document Index Number

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Captain R.T. Ziemer
Commanding Officer
U.S. Naval Station Mayport
P.O. Box 265
Mayport, Florida 32228

SUBJ: Draft Interim Measures Work Plan
Solid Waste Management Unit 19
Naval Station Mayport, Jacksonville, Florida
EPA I.D. No. FL9 170 024 260

Dear Captain Ziemer:

The U.S. Environmental Protection Agency (EPA) has completed its review of the draft Interim Measure Work Plan for Solid Waste Management Unit 19, Naval Aviation Depot Blasting Area, at Naval Station Mayport, Jacksonville, Florida. Based upon the review, EPA approves this document as an Interim Measure pursuant to condition II.D of your Resource Conservation and Recovery Act (RCRA) permit effective March 25, 1988. Enclosed is a general comment for the Navy's review during the implementation of the interim measure.

Should you have any questions or comments, please contact Mr. James W. Hudson of the Federal Facilities Branch at the above address or call at (404) 347-3555, extension 6448.

Sincerely,

Joseph R. Franzmathes
Director
Waste Management Division

Enclosure

cc: Eric Nuzie, FDEP
David Driggers, SOUTHDIVNAVFACENCOM

Interim Measure Work Plan
SWMU 19
Naval Station Mayport, Florida

General Comment

Although EPA approves the interim measure proposed by the Navy in the work plan (soil excavation and landfill disposal) as an acceptable remediation alternative, we believe alternative remediation techniques for disposing of the contaminated sand blasting grit (Black Beauty™), should also be adequately evaluated.

Solidification/stabilization has proven to be a viable alternative remedial action used extensively on RCRA and CERCLA sites to immobilize inorganic and low-concentration organic contamination. Treatability testing using sodium resistance solidification material can be performed to prevent degradation of the solidified material in the marine environment. Based on the low volume of soil, solidification/stabilization can be implemented with minimal equipment cost and can have significant cost savings to the federal government when compared to transportation and disposal of contaminated soils at a certified Subtitle C landfill. Therefore, EPA suggests that the Navy consider and include into the Work Plan, an evaluation of other remediation technologies and their cost/benefits before the proposed remedial action on SWMU 19 is performed.