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NS MAYPORT
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY INVESTIGATION FOR GROUP 3 SOLID WASTE MANAGEMENT UNITS NS
MAYPORT FL
3/9/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

248

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Naval Station Mayport
Administrative Record
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March 9, 1995

Mr. David Driggers
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 190010
North Charleston, S.C. 29419-9010

File: rfiwp5.doc

RE: Comments on Final Group III RFI Workplan, NAVSTA Mayport, Contract No. 62467-89-D-0317

Dear David:

I have reviewed the subject document dated November 1994 (received November 16, 1994) which included a revised Table of Contents, Table of Figures, Chapter 3 and Chapter 4 (received February 13, 1995) and offer the following comments:

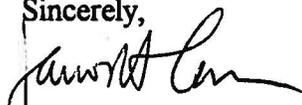
1. The Table of Contents, page V, lacks the 3.0 Chapter Heading.
2. Figures 3-9 and 3-10 do not show the location of soil samples SS-01, SS-02, SS-03 and SS-04. Please show their location or explain their location in the text.
3. The additional soil sampling sites on Figure 3-12 appear to adequately address previous Department concerns, and I understand that some deviation is allowed based on professional judgment and field results. I suggest that a sample also be obtained from the general location of the two former buildings south of the JSI Administration Building.
4. Bruce Arnett's partnering notes indicate that additional soil samples would be collected in the area of high mercury contamination. Section 3.1.2 does not indicate this. Will these additional samples be obtained? If so, it should be stated in this section.
5. The change of Tables 4-1 through 4-5 from the previous draft has been noted, as well as the response to previous Department Comments contained in the RFA/SV Workplan which outlines the necessity under the RCRA Permit of adherence to the methods specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-*

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846. Approval by the Department of the Workplan, which can reasonably be expected if comments 1 through 4 are adequately addressed, does not necessarily mean that we concur with the SW-846 PQL's as the only reporting value for analytes from the site. It is not expected that the Navy should change analytical methods; we *do* request that the Navy recognize the discrepancy in some analyte PQL's between the SW-846 methods and the ground water criteria used in Florida. I anticipate working actively at the Partnering meetings to help resolve this problem. One possible solution may be that the Navy require the contract laboratory to furnish the estimated values for those analytes that have PQL's that are higher than the ground water criteria in the Department's *Ground Water Guidance Concentrations*, June, 1994. These values may then be used as a screening and decision-making tool by the Department in assessing the NAVSTA Mayport data.

Thank you for the opportunity to comment on this document. We can discuss these points in detail at the next Partnering meeting, or if you have immediate questions or require further clarification, please contact me at (904) 488-3935.

Sincerely,



James H. Cason
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport
Peggy Lane, ABB-ES, Tallahassee
Jay Bassett, EPA Region IV, Atlanta
Satish Kastury, FDEP, Tallahassee
Ashwin Patel, FDEP Northeast District, Jacksonville
Brian Cheary, FDEP Northeast District, Jacksonville

TJB  JJC  ESN 