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



Lawton Chiles
Governor

249

Department of Environmental Protection

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8533-128
267

Naval Station Mayport
Administrative Record
09.01.00.0082

Virginia B. Wetherell
Secretary

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, SC 29419-9010

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RE: Final Group III RFA/Sampling Visit Workplan, NAVSTA Mayport

Dear David:

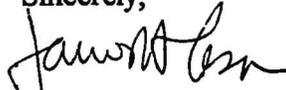
I have reviewed the subject document dated November 1994 (received November 16, 1994), which included a revised Table of Contents, Table of Figures, Chapter 3 and Chapter 4 (received February 13, 1995) and have found it to be technically adequate pending resolution of the following comment:

1. 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-846*. Approval by the Department of the Workplan 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.

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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

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