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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY INVESTIGATION GENERAL INFORMATION REPORT VOLUMES 1 AND 2 NS
MAYPORT FL
4/24/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

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

Naval Station Mayport
Administrative Record
09.01.00.0088

Virginia B. Wetherell
Secretary

April 24, 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: Review of Draft RFI General Information Report, Volumes I and II, NAVSTA Mayport

Dear David:

I have reviewed the subject documents dated February 1995 (received February 8, 1995) and offer the following comments.

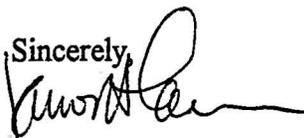
1. Volume I contained a number of typographic or other minor errors; to save time and space, I have already met with ABB and submitted those that I noted.
2. The potentiometric maps in Volume II also contained a number of errors and problems; I have discussed these with Frank Lesesne of ABB. He indicated that he was aware of many of the problems and intended to modify the figures. A little less data (but more accurate data) would improve them significantly.
3. Section 3.2.2., the Tidal Influence Study, is good but would be improved by summary figures that illustrate the zone of tidal influence and the magnitude of the influence. The locations of existing monitor wells should be included on this figure.
4. Figures 3-3 to 3-7 refer to elevations below mean sea level; this is not the case for all of the figures. Removing "below" solves the problem.
5. On page 2-30, Toxicity Testing, reference is made to Section 3.6. Either the reference is in error or the section is missing. Please correct the discrepancy.

6. On page 3-83, first paragraph, should "chloride" be "chlorine?"
7. Appendix C presents the facility background analytical data. From our many previous discussions, I understand that these data reflect the presentation of estimated ("J") values where applicable-where a "hit" was noted in the analysis that was below the normal detection limit and the value therefore was estimated. I assume that in the use of the "U" and "J" qualifiers in these data, in all cases if a "hit" as described previously was noted, a "J" value was reported. Is this assumption correct?
8. Appendix E-2 was missing. Is it not ready for review?
9. In Section 2.5.2, Identification of Human Health Chemicals of Potential Concern, Florida's primary, secondary and minimum criteria ground water standards should be utilized for screening. Additionally, the FDEP Memorandum from Ms. Ligia Mora-Applegate, *Criteria for Soil Cleanup Goals for Military Sites, April 5, 1995* provides goals which should be used as the soil screening values.
10. In the implementation of the tasks described in the section on Inhalation of Particulates from Soil (page 2-67), the EPA document EPA 540/R-94/106, 1994 should be consulted. This was also pointed out in Dr. Stephen M. Roberts comments (attached) regarding Appendix D-2.
11. On page 2-75, Remedial Goal Options, it is stated that EPA risk level is that exceeded by 10^{-4} . While this may be true, the default FDEP-acceptable risk level is 1×10^{-6} or less for carcinogens and a Hazard Quotient for non-carcinogens of 1 or less (Table 2, *Soil Cleanup Goals for Military Sites*, referenced above).
12. On the following page (2-76), the formulation of tables using appropriate cancer risks of 10^{-4} , 10^{-5} and 10^{-6} is described. In all instances, tables using 10^{-6} should be formulated as this is the Department-accepted carcinogenic risk value, as stated previously in comment 11 above. Additionally, for Remedial Goal Options for soils below two feet for protection of ground water, FDEP leachability goals should be used.

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Ms. Ligia Mora-Applegate also reviewed Appendix D, Human Health. Her comments, as well as those of Dr. Stephen M. Roberts, are attached and constitute the remainder of our comments on this document. If you have questions or require further clarification, please contact me at (904) 488-3935.

Sincerely,



James H. Cason
Remedial Project Manager

Attachments (2)

cc: Cheryl Mitchell, NAVSTA Mayport
Jay Bassett, EPA Region IV, Atlanta
John Mitchell, FDEP Natural Resource Trustee
Satish Kastury, FDEP, Tallahassee
Ashwin Patel, FDEP Northeast District, Jacksonville
Brian Cheary, FDEP Northeast District, Jacksonville
Jerry Young, City of Jacksonville

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