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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY ASSESSMENT SAMPLING VISIT REPORT FOR GROUPS 1 AND 2 SOLID WASTE
MANAGEMENT UNITS NS MAYPORT FL

6/6/1995

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0094

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

877-0742

June 6, 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: Draft RCRA Facility Assessment Sampling Visit Report, Groups I and II SWMUs,
NAVSTA Mayport

Dear David:

I have reviewed the subject report dated April 1995 (received April 17, 1995). The report is generally well done; I have met with Frank Lesesne and reviewed a number of minor typographic errors that will not be repeated here; however, the following comments need to be addressed in the final draft:

1. There are several references to the Federal National Contingency Plan (NCP) where it is stated that "for carcinogens, a lifetime excess cancer risk in the range of 10^{-4} to 10^{-6} represents concentrations that are protective of human health." The Department has, as a goal, cleanup levels for individual carcinogens corresponding to an incremental cancer risk of 10^{-6} for the most-exposed individuals. Since the cancer risk from multiple agents is additive and sites rarely involve exposure to only one carcinogen, the cumulative cancer risk posed by contaminants at most sites should be considered and the above statement from the NCP is not consistent with the stated position of the State of Florida with respect to acceptable risk levels.
2. Reference is made to FDEP guidance documents (McDonald, 1993; Cleanup Goals for the Military Sites in Florida, July, 1994) which have been revised. In some cases, changes are slight, but in others, new elements or compounds have been added (such as Beryllium in soil and Benzo(a)anthracene in sediment). Please utilize the latest guidance documents in preparing the final document as conclusions and possibly recommendations may change.
3. I suggest that, during future sampling events, an additional sampling site be added to Site 49, at the discharge point for the helipad flyup rinse area as we have previously discussed.
4. On page 4-7, Table 4-2, reference number 6 incorrectly relates Chapter 62-302 to the Florida Legislature, 1995. Please correct this error.

Mr. David Driggers

June 6, 1995

Page 2

5. Table 7-10, page 7-31 presents Water Quality Parameters for SWMU 48. This should be SWMU 28. Please correct it.

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 488-3935.

Sincerely,



James H. Cason
Remedial Project Manager

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
Jerry Young, City of Jacksonville

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