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MEMORANDUM AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT CORRECTIVE MEASURES STUDY GROUP 2 SOLID  
WASTE MANAGEMENT UNITS NS MAYPORT FL  
10/5/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Florida Department of  
**Environmental Protection**

**Memorandum**

**TO:** Jim Cason, P.G., Remedial Project Manager, Technical Review Section

**THROUGH:** Tim Bahr, P.G., Supervisor, Technical Review Section **B**

**FROM:** Greg Brown, P.E., Professional Engineer II, Technical Review Section **JB**

**DATE:** October 5, 1995

**SUBJECT:** Draft Corrective Measures Study; Group II Solid Waste Management Units (SWMUs); Naval Station Mayport, Florida.

I reviewed the subject document dated July 1995 (received July 17, 1995). It is adequate for its intent with the exception of the following minor comments:

1. Page 4-2, Section 4.2.1.1, proposes a Corrective Action Objective for SWMUs 6, 7, 8, 9, 10, and 11 as, "Eliminate petroleum-contaminated sludge and soil at SWMUs 6 and 7 that contribute to the presence of LNAPL." I suggest that the CAO be broadened to consider all contaminated media including contaminated groundwater and phreatic soils.
2. Page 4-3, provides a rationale for not considering a CAO for protection of ecological receptors, "An assumption of no risk to aquatic life resulting from potential exposure to groundwater was made because groundwater would be diluted at least five times as it discharges to the St. Johns River." This is not consistent with present Department policy and is not sufficient justification for not including a CAO for ecological protectiveness. This issue could possibly be resolved with more thoughtful formulation of CAOs (refer to comment 1).
3. Page 4-6, highlights a potential public health threat. Obtaining public health data to resolve this potential threat should be the Navy's principal concern (i.e., is the water table aquifer being used as a potable water source?). Has the RAB been briefed about this issue? In addition, "Evaluate the distribution of BHC in groundwater at SWMU 15" is not a CAO, but a data gap. If groundwater is contaminated and poses a potential risk, a CAO is needed to define the objectives to resolve the risk and contamination.
4. Table 5-1 screens out in-situ treatment technologies such as soil vapor extraction and biodegradation. Based on the Department's knowledge of the SWMUs 6 & 7, the stated

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reasons for not considering these technologies in alternative formulation do not seem justified. The Navy may be missing good opportunities to achieve cleanup goals at minimal cost by not considering potentially applicable in-situ treatment technologies.

5. Section 7. The Department makes the following suggestion before the Navy chooses the preferred alternative for SWMUs 6 & 7. The Navy's Mayport project manager should talk with the Cecil Field project manager to obtain empirically based performance, cost, and management data on remediation projects that involve large-scale excavation and on-site thermal-treatment of petroleum contaminated soil.
6. The proposed preferred alternative for SWMU 15 seems to be both protective and practical (once the potable groundwater issue is resolved; refer to comment 3).

Because of the minor nature of these comments, I suggest the following approach to finalizing this document, contingent upon the mutual concurrence of you and the U.S. EPA Region IV. A letter from the Navy providing acceptable responses to the Department's and U. S. EPA's regulatory comments would be incorporated into the draft CMS along with an engineering certification signed, sealed, and dated by the responsible engineer. The "Draft" covers would be replaced with the Navy's standard "Final" green covers. The original document along with the approved Navy response letter and engineering certification would constitute the final CMS for this project. My teams are using this approach at Eglin AFB and Hurlburt Field AFB with good success, producing significant reductions in time and costs associated with document review and revisions while maintaining accountability. If you have any questions, please contact me by phone at (904) 488-3935 or by email at Brown\_GM@dep.state.fl.us.