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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING REVISED REMEDIAL ACTION PLAN BIOAUGMENTATION
CORRECTIVE ACTION NS MAYPORT FL
10/16/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0107

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

Virginia B. Wetherell
Secretary

October 16, 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 Revised Remedial Action Plan, (RAP), Bioaugmentation Corrective Action,
Naval Station Mayport, August, 1995, FIFCO International

Dear David:

I have reviewed the above named Remedial Action Plan dated August, 1995 (received September 18, 1995) and offer the following comments:

1. Section 4.0, Soil Sampling Plan: this section has apparently been copied from another document and, while this is not necessarily a problem, it does give an impression of questionable application to the present project - such as discussing the decontamination of a drill rig.
2. Section 5.0, Confirmatory Sampling (including Section 5.1 and 5.2): The Navy should assure that FIFCO and ABB are consistent concerning the confirmatory sampling; the proposed ABB confirmatory sampling scheme bears little resemblance to that presented by FIFCO, notably that FIFCO specifies a large amount of additional sampling than does ABB and apparently does not recognize the "hot spot" distribution of the contaminants of concern.
3. Section 5.3 and 5.4, Field Screening: it is understood that field screening will be carried out by FIFCO pursuant to it's own needs; however, the correlation of at least some of the field screening points and the confirmatory sample points that will be utilized by ABB should at least be considered in the interest of producing a better data set.
4. Figure 3 - Isoconcentration of Contaminants: Of the 21 separate figures in this section, 18 are unnecessary since they do not pertain to the present evaluation. Figures 3S, 3T and 3U should be retained since they pertain to the contaminants of concern in this project. Additionally, and as previously stated, it is misleading to represent these data as isocontours; ABB obtained the original data did not choose to represent it as isocontours and noted that for several parameters, there was no pattern to their distribution.

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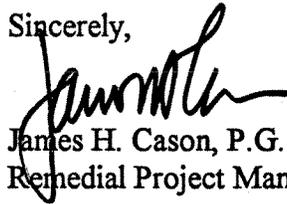
Mr. David Driggers

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This plan, now revised to use surface application by drip irrigation methods and not use wells or infiltration galleries as methods of media application seems reasonable for the intended demonstration. Having ABB conduct the confirmatory sampling will also add credence to the data from the project. In this regard, since ABB Environmental Services will conduct the confirmatory sampling for this project pursuant to an approved implementation plan, comments 2 and 3, above, are important. Accordingly, please refer to my related comments on the ABB document, as it relates to the FIFCO project. If you have questions or require further clarification, please contact me at (904) 921-9994.

Sincerely,



James H. Cason, P.G.
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport
Martha Berry, EPA Region IV, Atlanta
Pat Kingcade, FDEP Office of General Counsel, Tallahassee
Terry Hansen, ABB Environmental Services, Tallahassee
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TB B JJC ESN ESN