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NS MAYPORT  
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING GENERAL PROCEDURE FOR IN SITU HYDROCARBON SOIL  
BIOREMEDIATION AND GENERAL PROCEDURE FOR BIOREMEDIATION OF  
HYDROCARBON CONTAMINATED SURFACES NS MAYPORT FL  
10/19/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Department of Environmental Protection

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

Virginia B. Wetherell  
Secretary

367  
Naval Station Mayport  
Administrative Record  
09.01.00.0109

October 19, 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 RHS Technical Services General Procedure Documents:  
General Procedure for In-Situ Hydrocarbon Soil Bioremediation; and,  
General Procedure for Bioremediation of Hydrocarbon Contaminated  
Surfaces, NAVSTA Mayport

Dear David:

I have reviewed the above named documents dated September 8, 1995 (received September 22, 1995) and offer the following comments. I note that many of my comments have been previously stated, either by teleconference call or in my previous comments in my letter of April 24, 1995 which addressed the hydrocarbon contamination on concrete surfaces.

### General Procedure - In-Situ Hydrocarbon Soil Bioremediation

1. The stated purpose is to "eliminate" hydrocarbon soil contamination below the established acceptable limits; these limits are not stated in the proposal. The acceptable limits for soil contamination in Florida are as stated in Chapter 62-775.400 and on pages 42-43 of *Guidelines for Assessment and Remediation of Petroleum Contaminated Soil, FDEP May, 1994*. The proposal intends to utilize only the "Petroflag" method of hydrocarbon analysis. This method may be adequate for its intended purpose (demonstration) and it may produce reasonable analytical results; however, the actual disposal or the determination of achievement of soil remediation of such soils should meet the above criteria, including the utilization of the named test methods.
2. Regarding the proposed soil testing, unless the techniques follow an approved (or stated) analytical plan, one cannot tell much about the sampling - soil volumes, location, depth, duplicates, etc. are not stated. This section should be expanded with definitive information.
3. No formal sections on Results and Conclusions are proposed. Unless the Navy intends to make these determinations, I suggest that this be made a part of Section 5.0. It is

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

Mr. David Driggers  
October 16, 1995  
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If you have questions or require further clarification, please contact me at  
(904) 921-9994.

Sincerely,



James H. Cason  
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport  
Martha Berry, EPA Region IV, Atlanta  
Terry Hansen, ABB Environmental Services, Tallahassee  
Satish Kastury, FDEP, Tallahassee  
Brian Cheary, FDEP Northeast District

TB B JJC JJC ESN B for ESN