

N60201.AR.000276
NS MAYPORT
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING IMPLEMENTATION PLAN TECHNICAL DEMONSTRATION FOR
BIOREMEDIATION OF CONCRETE SURFACES AND SOIL AT SOLID WASTE
MANAGEMENT UNIT 14 NS MAYPORT FL
10/31/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Naval Station Mayport
Administrative Record
09.01.00.0111

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 31, 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

file: rhs_imp.doc

RE: Review of Implementation Plan NELP Technical Demonstration for
Bioremediation of Concrete Surfaces and Soil at SWMU 14, NAVSTA
Mayport

Dear David:

I have reviewed the above Implementation Plan dated October 1995 (received October 16, 1995) and offer the following minor comments. I have previously furnished comments on the demonstration contractor (RHS Technical Services Inc.) Workplan in a letter dated October 16, 1995.

1. Section 1.4, page 1-9 and page 2-1: the statement that 1000 square yards will be treated appears to be erroneous; approximately 798 yards appears to be the correct amount.
2. Section 3.3.2, page 3-10: indicates that sampling will occur during the beginning, middle and end of the runoff event. I suggest quantifying the event (by volume or time) prior to beginning the actual runoff water application (I know this is obvious). Additionally, some thought should be given to the time since antecedent rainfall during both the initial characterization sampling and the confirmation sampling since it seems like this may affect the sampling results.
3. Section 3.3.2, page 3-12: this section discusses baseline and performance sampling; will the practice of "roto-tilling" during the demonstration affect the direct comparison of samples?

The utilization of ABB Environmental Services for oversight and performance assessment will help assure that the demonstration will be well documented. If you desire, you may send the Final covers and the certification page for this document and I will put them in this draft. If you have questions, need additional copies of appropriate rules or require further clarification, please contact me at (904) 921-9994.

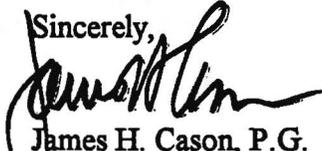
"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Mr. David Driggers

October 31, 1995

Page two

Sincerely,



James H. Cason, P.G.

Remedial Project Manager

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

TB B JJC JJC ESN ESN