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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING RESOURCE CONSERVATION AND RECOVERY ACT FACILITY  
INVESTIGATION FOR GROUP 1 SOLID WASTE MANAGEMENT UNITS VOLUMES 1 AND 2  
OF 2 NS MAYPORT FL  
11/7/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Department of Environmental Protection

Naval Station Mayport  
Administrative Record  
09.01.00.0112

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

Virginia B. Wetherell  
Secretary

November 7, 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 RFI for Group I SWMUs, Volumes I and II, Naval Station Mayport

Dear David:

I have reviewed the above documents dated August 1995 (received August 28, 1995) and offer the following comments:

1. Table 3-3, page 3-17: the entries for the elevation of MPT-2-MW32S and MPR-2-MW34I appear to be in error. Please recheck these values.
2. Plate 1: at least two contour intervals are labeled erroneously; both are around the runway. The five foot contour interval is mislabeled as the four foot contour in the area northwest of SWMU 4; the seven foot contour in the center of the runway is labeled as the nine foot contour.
3. Section 3.2.3, Hydraulic Conductivity: the text discusses the values for SWMUs 2,3, 4, 5 and 22 and refers to Table 3-7; however the table does not contain data for SWMU 22.
4. SWMU 4, Landfill E, Page 4-6: were any soil samples collected from the surface to 2 feet BLS? If not, why not?
5. Sediment sampling for SWMUs 3,4,5 and 50, page 4-12: the author describes the sediment sample as "sludge." I assume that the use of this descriptor relates only to the general visible appearance of the material and is not related to any chemical property. Is this true?
6. Soil sampling, page 4-14: please indicate why surface soil samples were not obtained at the locations noted on this page.

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7. Western Area Sediment Assessment, Organics, page 4-150: the discussion relates to surface water samples, apparently in error.
8. Page 4-206: the statement is made, "there appears to be a pattern for the distribution of various VOCs and SVOCs in different zones of the surficial aquifer." The implication is that this will be further discussed; however, this does not occur. Are additional statements or further explanation needed in this paragraph? What is the "pattern?"
9. Section 4.4.4.2, Surface Water and Sediments, Aquatic Life: this section discusses the results of risk characterization and leads to the subsequent recommendation to further define the degree of contamination and risk in the area around the SWMUs and a recommendation to assess the possibility of filling in the ditch at SWMU 4. The discussion and Plate 3 discusses and depicts the possibility of the skeet range and the pistol range as possible sources of contaminants; however, the possibility of the two munitions storage areas is not considered. Since plots of the contaminated sediment stations indicates spacing around not only the SWMUs, but also around the perimeter ditch which has the munitions storage areas and the skeet/pistol range in common, it seems as if this possibility should also be evaluated. Additionally, we may want to consider the possible role of chelation and subsequent accumulation of contaminants within the organic sediment fraction in the perimeter ditch, which could lead to the conclusion that a release of contaminants has occurred.
10. Section 6.1.4, Recommendations: no further investigation is recommended for the landfill area; however, additional ecological sampling to help assess the filling in of the ditch that bisects SWMU 4 is later recommended. As noted in comment 9 (above), it seems that reasonable doubt exists as to whether the high metal concentrations and the ecologically-toxic sediments in the perimeter ditch are related to the SWMU or to other ongoing activities in the area. While I generally favor the filling in of the bisecting ditch at SWMU 4, I also feel that the Navy needs to address the issue of metals and toxicity in the ditch sediments further with additional investigations.
11. The Department has promulgated final soil cleanup goals since the draft of this document was produced. In some instances, the guidance concentrations have changed from the prior (April, 1995) interim guidance. The Navy may want to consider use of the newer guidance; however, this is not mandatory.

I am attaching comments from Ms. Jane Fugler regarding the Ecological Risk Assessment and from Ms. Ligia Mora-Applegate and Dr. Stephen Roberts regarding the Human Health Risk Assessments. Please address their comments also.

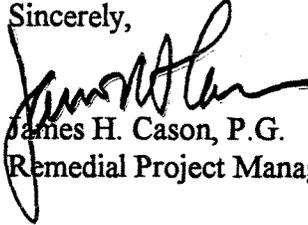
Mr. David Driggers

November 7, 1995

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Thank you for the opportunity to review this document. If you have questions or require further clarification, please feel free to 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  
Terry Hansen, ABB Environmental Services, Tallahassee  
Satish Kastury, FDEP, Tallahassee  
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