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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL DRAFT WORK PLAN NAVY ENVIRONMENTAL
LEADERSHIP PROGRAM TECHNOLOGY DEMONSTRATION FOR LOW TEMPERATURE
THERMAL DESORPTION NS MAYPORT FL

12/20/1995

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

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

Naval Station Mayport
Administrative Record
09.01.00.0113

Virginia B. Wetherell
Secretary

December 20, 1995

Mr. Harold McGill
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 Final Draft Work Plan - NELP Technology Demonstration for
Low Temperature Thermal Desorption at SWMU 6 & 7, Southwest Soil
Remediation Services, NAVSTA Mayport

Dear Mr. McGill:

I have reviewed the above named document (undated - received November 20, 1995) and although the pages are not numbered, I will use the best references for the portions of the document in question and offer the following comments:

1. Section I, Work Plan: the index lists various headings - the heading "Full-Scale Remediation" should be changed to "Full-Scale Technology Demonstration" since this is a demonstration project.
2. Work Plan, B. Soil Excavation: the use of plastic sheeting to cover the excavated contaminated soil is not mentioned but is a condition of item 21 of the permit.
3. D. Initial Decontamination: the document mentions the inspection of the plant but does not name the inspector (the Navy, ABB or whomever) nor does it delineate how the inspection will be carried out. It seems to me that the Navy would want to be (at least one of) the inspector(s).
4. Stockpiled soils must be managed appropriately for storm water control purposes and steps should be taken to assure that any generated storm water runoff will not be discharged offsite. This includes the use of berms, appropriate discharge channels or devices and the use of plastic film for occlusive purposes above and below contaminated soil (and for treated soil until such time that it has been shown to meet cleanup goals).

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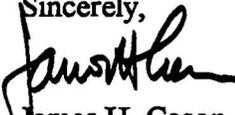
5. There are a number of statements where decisions or confirmations are alluded to which will be followed by an action on the part of the contractor such as the action of backfilling with treated soil after analytical confirmation of achievement of cleanup goals. It appears that a Navy contact person or "Site Manager" should be named to confirm the applicability and timing of those various actions by the contractor.
6. Quality Control Plan; Excavation/Stockpiling: excavated stockpiles must be covered with plastic-this is a condition of the Department Permit (Item 21).
7. The emergency routing to hospitals or emergency facilities should be expanded and maps appended; Federal, State and Navy Representatives, as appropriate, should be named and phone numbers furnished.
8. Future Work Plans should contain numbered pages.
9. The Final Work Plan must be Signed and Sealed by a Florida Registered Professional Engineer.
10. It appears that there is some confusion on the part of the contractor regarding his regulatory responsibilities during the technology demonstration. The thermal treatment facility will operate pursuant to a permit issued by the Department under Chapter 62-212, F.A.C.; it is my understanding that this permit is forthcoming. While operating under this permit, the facility will thermally treat petroleum-contaminated soils. Treatment of such soils is regulated under Chapter 62-775, F.A.C. It is the responsibility of the Permittee to comply with all aspects of this rule in addition to the permit conditions and Chapter 62-212, F.A.C. Chapter 62-775, F.A.C. is very specific in delineating how thermal treatment of soils will take place. The contractor should recognize that operation of the facility requires specific actions such as Department notification under Chapter 62-775.300(2) and soil sampling and analysis in accordance with Chapter 62-775.410 as specified in Chapter 62-775.300 (5). Aspects such as sampling will take place fulfilling Quality Assurance Criteria in Chapter 62-160, as specified in Chapter 62-775.300 (10). Additionally, for pretreatment soil sampling, the number, volume and location criteria for samples are clearly delineated in Chapter 62-775.410 (3) and is also mandated by Specific Conditions of the Permit during Emission Testing. These and other conditions must be adhered to during operation under this project. Deviation from any provision of the rules is possible only by Department Approval of Alternative Procedures under Chapter 62-775.500, F.A.C. The contractor would be well advised to closely follow the applicable rules to help formulate his work plan.
11. Other tests beyond those specified in the rules such as for technology demonstration purposes may also be necessary. Responsibilities of the contractor and the Navy should be clearly delineated prior to beginning activities under this project. Operation of the thermal treatment facility carries with it the responsibility to fulfill the conditions of

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applicable rules and regulations by Southwest Soil Remediation, Inc., the permitted operator of the facility.

Finally, while this is a technology demonstration project for the Navy, the technology is not considered that "innovative" in Florida; accordingly, we already have a regulatory mechanism in place for such projects. This project differs from other similar (and common) projects here in Florida in that some operational aspects and decisions are apparently within the responsibility of the L.T.T.D. contractor and not by an onsite Navy Project Manager. Statements within the draft work plan intended as disclaimers do not relieve the Permittee, Southwest Soil Remediation, Inc., of ultimate responsibility for operation of the project under applicable Florida rules and regulations. If copies of any applicable rules are needed, please let me know and I will send them to you.

Thank you for the opportunity to review this document. If you have questions or require further clarification, please feel contact me at (904) 921-9994.

Sincerely,

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

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

TB  JJC  ESN 