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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING LETTER REPORT FOR SURFACE SOIL SAMPLING AND  
ANALYTICAL RESULTS FOR OLD PESTICIDE HANDLING AREA NS MAYPORT FL  
12/21/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Department of Environmental Protection

Naval Station Mayport  
Administrative Record  
09.01.00.0114

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

Virginia B. Wetherell  
Secretary

December 21, 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: Letter Report - Surface Soil Sampling and Analytical Results for the Old Pesticide Handling Area, U.S. Naval Station Mayport

Dear David:

I have reviewed the named letter report dated September 8, 1995 (received September 18, 1995) and offer the following comments:

1. The report states that the Old Pesticide Area is not an Area of Concern; however, in a letter dated October 19, 1995 to Mr. Joseph Franzmathes, Region IV EPA, M.J. McVann, Acting Staff Civil Engineer, stated that this area was an Area of Concern. Please clarify the status of this area.
2. The report stated that FDEP Soil Cleanup Guidance was not exceeded for a residential or industrial scenario for benzo (a) pyrene and dibenz (a,h) anthracene. The residential guidance number (FDEP April, 1995 guidance) for each analyte was 140 ug/Kg and was exceeded for benzo (a) pyrene in samples MPT-PS-SS02 and MPT-PS-SS02 (duplicate) and in the duplicate for dibenz (a,h) anthracene. The final guidance (September, 1995), although finalized after this document was produced, has a lower residential scenario value for both analytes of 100 ug/L, which would have the effect of increasing the risk from these compounds in the soil.
3. The report states that concentrations for organic analytes did not exceed the FDEP risk values; however, Table 4 indicates that the estimated cancer risk based on FDEP, April 1995 guidance for a residential exposure to the benzo (a) pyrene component was 3E-6. This value exceeds the FDEP risk value of 1E-6. Using the final September guidance values, these numbers will be even higher.
4. Based on the above analytical values, please justify why a ground water sample for semivolatle compounds and pesticides was not obtained. I am aware of similar sites at the

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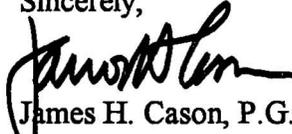
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base (such as SWMU 15) where pesticide concentrations in the soil were greater and little or no ground water contamination was observed, but it seems reasonable that a ground water sample, even if from a temporary well, should be obtained.

Thank you for the opportunity to review these data and the report. The Navy should consider these comments in a subsequent draft of this report and may want to evaluate the possible use of deed restrictions, if appropriate for the site. 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, OGC, FDEP Tallahassee  
Terry Hansen, ABB Environmental Services, Tallahassee  
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TB  JJC  ESN 