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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY INVESTIGATION FOR GROUP 2 SOLID WASTE MANAGEMENT UNITS VOLUME
1 AND 2 NS MAYPORT FL
5/16/1996
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

NAVSTA Mayport Administrative Record
Document Index Number

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Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 16, 1996

Mr. David Driggers
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, SC 29419-9010

file: g2rfi_fi.doc

RE: Final RFI for Group II SWMUs, Volumes I and II, Naval Station Mayport

Dear David:

I have reviewed the subject document dated January 1996 (received February 2, 1996). The responses to our previous comments are adequate and the document is approved; however, there are a number of points that I would like to discuss further and offer for your additional consideration:

1. As a statement of clarification and in a similar manner that I have previously commented concerning the Corrective Measures Study for Group II SWMUs (as have others in the review of this document), I am concerned that the Navy has not adequately addressed ground water contamination at the Oily Wastewater Treatment Plant (OWTP) area. To its credit, the Navy has instituted or proposed two Intermediate Measures which address the excessively contaminated soils and the LNAPL at the site. In my previous comments on the CMS, I asked the Navy to address the ground water situation at the OWTP area. This RFI also discusses the need for additional monitoring of the groundwater at the OWTP. No changes are necessary in the RFI; I merely wanted to restate my position concerning the ground water at the OWTP area and remind the Navy of the need to keep this as a priority while the soils and LNAPL are being addressed at the OWTP site.
2. In the Executive Summary, the cancer risk should be corrected to be attributed only to arsenic, not to arsenic and lead. This was previously commented on but the change was not made.

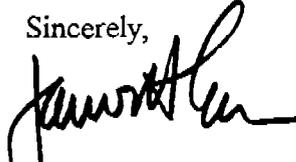
Thank you for the opportunity to review this document. These concerns may be addressed by furnishing corrected pages and I will insert them into the existing document. If you have questions or require further clarification, please feel free to contact me at (904) 921-4230.

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

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Mr. David Driggers
May 16, 1996
Page two

Sincerely,



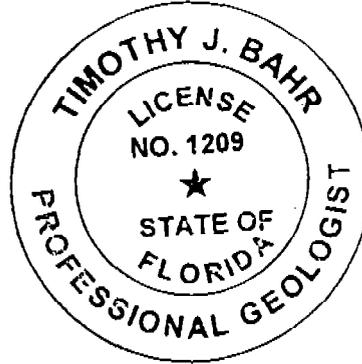
James H. Cason, P.G.
Remedial Project Manager

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

Reviewed by:



Timothy J. Bahr, P.G.
Professional Geologist Supervisor
Bureau of Waste Cleanup



5/17/96

Date

JJC  ESN ESN