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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT INTERIM MEASURE WORK PLAN SOLID WASTE  
MANAGEMENT UNIT 7 LOW TEMPERATURE THERMAL DESORPTION NS MAYPORT FL  
5/17/1996  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

# Department of Environmental Protection

Naval Station Mayport  
Administrative Record  
09.01.00.0124

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

May 17, 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

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RE: Draft Interim Measure Work Plan, SWMU 7 Low Temperature Thermal Desorption,  
Bechtel Environmental Inc., US Naval Station Mayport; April 1996

Dear David:

Greg Brown, P.E., and I have completed our review of the Draft Interim Measure Work Plan for Low Temperature Thermal Desorption at SWMU 7, Mayport Naval Station (dated April 1996; received April 12, 1996) submitted by Bechtel Environmental Incorporated. My comments follow and Mr. Brown's comments are attached. These comments should be adequately addressed before approval can be considered.

1. Section 1.4: The CMS for SWMUs 6 and 7 has not received final approval by the regulatory agencies; this document is currently still under review. The statement that the agencies have concurred with the recommendation, while likely, is in error.
2. Section 2.1: Duval County should be included in the letter of notification, as required.
3. Section 2.5, Site Setup: the statement "establish controls necessary to meet the intent of Chapter 62-775, F.A.C." should be expanded sufficiently to enable review.
4. Section 2.5.5, Stormwater Management Controls: this section alludes to "discharge or disposal capabilities in the event of a 100 year storm event." Based on experience at other facilities and as previously mentioned above, these need to be delineated in sufficient detail to allow for review. Further, it is stated that "the excavation procedure will ensure that there is no open excavation during periods of anticipated storm events." Please explain how this procedure will be achieved. Finally, paragraph six indicates that excess water that may accumulate in the area of the LTTD unit, sump or treated stockpile area will be pumped into the existing sludge drying beds or back into one of the open excavations" and "water from the sump can be pumped into the two 20,000 gallons tanks....." Has the Navy indicated approval of these procedures? How will this practice affect the LNAPL recovery project?

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

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5. Section 2.6, Pre-Treatment Sampling: this section goes into considerable detail regarding how sampling will be accomplished. In-situ sampling is proposed; however, discussion of variable excavation depths is noted. Please be aware that sampling must meet the regulatory criteria which are based on volume or tonnage of soil to be treated. Variations in the level of the water table can increase or decrease the actual number of samples required. I know this sounds simple; however, planning for a certain number of samples which do not account for these variations can lead to an insufficient number of samples obtained. Additionally, mention is made that the soils in the areas of the berm are "assumed to be non-contaminated." This status should be verified in the field by use of an OVA.
6. Section 3.1, Non-Contaminated Soil Excavation: this section discusses staging and the utilization of the 50 ppm OVA level for judging soils that will be remediated. Please be aware that in the FDEP publication, Guidelines for Assessment and Remediation of Petroleum Contaminated Soil, page 13, it states that the standard is a rough approximation of potential to contaminate ground water. It would be prudent on the part of the Navy to assure that soils that yield OVA readings above 10 up to 50 should be considered as potential leachate-producing soils and that adequate steps be taken to offset this possibility if these soils are stockpiled.
7. Section 3.3, Contaminated Soil Excavation: this section discusses generally the concept of an excavation/backfill sequence that reduces the amount of open excavation. Previous discussions in Section 2.5.5 indicated that stormwater may be pumped into the open excavation (see comment 4, above). These sections seem counter to one another. Please clarify this section in greater detail.
8. Section 3.5, Low Temperature Thermal Desorption: if the LTTD method is approved in the CMS, the contractor should be aware that assuming that only petroleum contaminated soils will be treated is not adequate: this is the reason for pre-treatment samples. This particular project is the continuation of a process of investigation, demonstration and now, full scale treatment; because of the semi-continuous nature of this process, lines of responsibility often tend to become blurred. Similar to the fact that the operator of the LTTD unit is responsible for performance under his operational permit for assuring the type of material treated and the extent to which treatment occurs, so too does the contractor of this project bear responsibility for all aspects within the project outlined in the work plan. Statements such as "it is assumed that the requirements of Chapter 62-775 F.A.C. that only petroleum contaminated soils be treated is met" tend to add to the blurring of the lines of responsibility. Accordingly, such statements are inappropriate in the work plan because they do not address the actions that will be taken if the requirements are not met. The lines of responsibility for this project need to be clearly understood by the contractor and the Navy prior to beginning this project.

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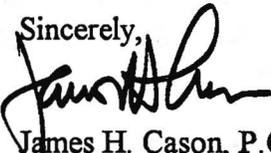
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9. Has the Navy agreed to the 24 hour day/6 day week operation? Further in this paragraph, it is stated that following treatment and confirmation of achieving clean soil criteria, the soils will be transferred to the backfill staging area. It is suggested that the Navy and the contractor outline a method whereby this process will occur, including the point at which the Navy concurs with the contractor on the clean nature of the treated soil.
10. Section 3.5, page 16: it is stated that contaminated particles greater than 2 inches will be screened. I know that there are oyster shells in the sediments that exceed this size. What will be done with these materials?
11. Section 3.6, Treated Soil Stockpile: the statement that if the material needs to be retreated, it will be done so at the subcontractors expense may be correct but it seems that it does not belong in this work plan.
12. Section 4.3.2, Decontamination Water: has the Navy agreed to allow the decon water to be disposed of in the tanks at the free product recovery system? If not, what will be done with it?
13. Section 4.3.3, Contaminated Soil Stockpile Leachate: similar to my previous comment and comment number 4, has the Navy agreed to accept the leachate? If not, what will be done with it?
14. Section 4.3.4, Free Product or LNAPL: the proposed final disposition of any LNAPL that is recovered should be discussed.
15. Section 6.2.4, Post Treatment Soils: some indication of the identity of the QC representative should be given. Is the QC representative the Quality Assurance Manager as noted in Section 8.1?
16. Table 8-1, Responsibility Assignment Matrix: the matrix again reflects my comment 8, above, in that the LTTD subcontractor has regulatory requirements imposed by his operational permit which may not necessarily reflect the requirements of this work plan. While not a great concern with me, Bechtel and the Navy should understand any differences.
17. Addendum to the QA Program Plan, page 1., Introduction: this paragraph (consisting of one sentence) is incomplete.
18. Scope of Work, Page 1: the paragraph indicates that it is the responsibility of subcontractors to meet the technical and quality requirements of the plans, specifications and drawings applicable to their scope of work. While this may be true, it is the ultimate responsibility of Bechtel to assure that those requirements are met if those data and information produced by the subcontractor will be utilized or presented as a result of

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activities conducted subsequent to this work plan and ultimately signed and sealed as to professional adequacy by Bechtel.

Many of the concerns noted by Mr. Brown and I concern the operation of the proposed project in relation to weather (and subsequent stormwater management) and the lines of responsibility for the day to day operations. Thoughtful responses will greatly increase the chances for an efficient and well managed project. Thank you for the opportunity to review this work plan. If you have questions or require further clarification, please contact me at (904) 921-4230.

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

Attachment (1)

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

TB B JJC JJC ESN ESN

## Memorandum

# Florida Department of Environmental Protection

**TO:** Jim Cason, P.G., Remedial Project Manager, Technical Review Section

**THROUGH:** Tim Bahr, P.G., Supervisor, Technical Review Section <sup>B</sup>

**FROM:** Greg Brown, P.E., Professional Engineer II, <sup>AB</sup> Technical Review Section

**DATE:** May 16, 1996

**SUBJECT:** Draft Interim Measure Work Plan; Solid Waste Management Unit 7; Low Temperature Thermal Desorption; Naval Station Mayport, Florida; Revision A; prepared by Bechtel Environmental, Inc.

I reviewed the subject document dated April 1996 (receipt date unknown). Your review comments were very thorough and I will merely emphasize points you noted that I believe are important.

1. The Atlantic hurricane season begins in June and ends in October. Contingencies for tropical storms should be planned for IM activities during this period.
2. The workplan describes a limited QA/QC oversight program from the perspective of the prime contractor. The detailed inter-relationships between the prime contractor, subcontractors, consultants, and the Navy are not explicit. For example, the Navy attempts to define roles and responsibilities with a "responsibility assignment matrix"; however, its usefulness is limited. What roles and responsibilities are defined by the terms "lead," "support," or "oversight." What competent individuals have responsibilities for identifying problems, implementing corrective measures, determining attainment of cleanup standards, or making other critical decisions? Who will collect and maintain correct, accurate, and unbiased records? Third-parties such as the regulatory agencies need to be confident that the project is being credibly accomplished. The prime contractor and their subcontractors may be able to take some routine responsibilities with a minimum conflict of interest, but the Navy has ultimate responsibility for the safety and effectiveness of the interim measure. The distribution of responsibilities should therefore be explicit to the Navy.
3. The workplan proposes to use the two 20,000 gallon tanks of the free-product recovery system for contingency storage. What is the status of the free-product recovery system? Has

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the freeze damage been repaired and is the system back in operations? If not, why? Was the construction oversight for this project adequate and can it be ascertained that it was properly installed?

4. The final completion report should be signed, sealed, and dated by a Florida registered professional engineer with responsible charge.
5. Note that the Group II CMS has not been approved and is still a draft document.
6. How are the fines from the baghouse managed? The potential is high that these fines may contain significant levels of contamination.
7. I suggest that when the site is reseeded, the Navy use a fertilizer that does not contain metal supplements.

Please call me if you have any questions.