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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING SAMPLING AND ANALYSIS PLAN FOR INTERIM MEASURE
PERFORMANCE SPECIFICATIONS AT SOLID WASTE MANAGEMENT UNITS 4, 49 AND 50
NS MAYPORT FL
7/22/1996
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

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Virginia B. Wetherell
Secretary

July 22, 1996

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: Sampling and Analysis Plan for Interim Measure Performance Specifications. Solid Waste Management Units 4, 49 and 50; U.S. Naval Station, Mayport, Florida

Dear David:

I have reviewed the subject document dated July 10, 1996 (received July 12, 1996). Please consider the following aspects in the final draft.

SWMU 4:

1. We have previously discussed the possibility of the sediments in the ditch at SWMU 4 as serving as a vehicle for (bio)accumulation in the organic matrix of the sediments. It appears that the proposed sampling does not account for the organic matrix versus the sandy dredge material. It seems to me that the sampling at each point should consist of at least one organic matrix sample followed by one into the proximal sandy underlying material, then an additional sample some distance further into the sandy horizon. I am not sure that strict adherence to measured intervals will yield the best understanding of the potential contamination in the ditch. Finally, I suggest that the thickness of the organic matrix should be determined at a sufficient number of points to enable basic spatial/vertical characterization (such as by use of simple visual cross-sections).
2. I suggest that TCLP analyses for inorganic constituents be conducted on both the organic matrix sample and the underlying sand horizon which yield the highest analytical values for potentially toxic materials.

SWMU 49:

3. Has previous sampling from this SWMU determined that an organic matrix exists at this location? This information needs to be taken into account considering the thoughts expressed in comments 1 and 2 (above).

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Mr. David Driggers

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SWMU 50:

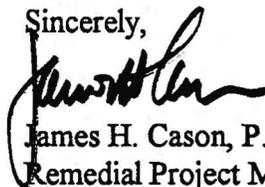
4. The background sample described in paragraph 3, page 6, should be obtained and utilized taking into account the thoughts in comments 1 and 2 (above). This is especially important if the matrix and underlying sediments are significantly different.
5. The possible use of two different indicator species is proposed, depending on water quality parameters (fresh versus estuarine, I assume). The background sample MPT-B-SW/SD05 as noted on Plate 1 of the GIR (1995) appears to be adequately located for physical/chemical characterization; however, it may necessitate the use of a different indicator species since it will possibly be estuarine in nature. Will this be a problem? If the background sample cannot be relocated, can the toxicity testing at least be conducted on both indicator species?

General Comments:

6. I cannot determine the nature of the proposed sampling technique(s). I suggest that the use of a piston corer (or similar device) be considered which will enable determination of any distinct interfaces and allow exact sampling and characterization of the desired intervals.

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-4230.

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
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TB B JJC JR ES NESV