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NS MAYPORT
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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT REPORT OF
TECHNOLOGY DEMONSTRATION BIOREMEDIATION OF CONCRETE SURFACES AND
SOIL AT SOLID WASTE MANAGEMENT UNIT 14 NS MAYPORT FL

11/7/1996
U S EPA REGION IV

NOV 07 1996

****PINK****

4WD-FFB

Mr. Harold McGill
SOUTHNAVFACENGCOM
P.O. Box 190010
2155 Eagle Drive
North Charleston, SC 29419-9010

SUBJ: NAVSTA Mayport, FL
NELP Technology Demonstration Report - SWMU 14
EPA I.D. FL9 170 024 260

Dear Mr. McGill:

I have reviewed the **NELP Technology Demonstration Bioremediation of Concrete Surfaces and Soil at SWMU 14** draft report, RHS Technical Services, Inc. RHS performed this work as a demonstration project for new technologies under the Naval Environmental Leadership Program (NELP). Following are my comments:

Overall Comment - The report should contain a more detailed description of site activities. The first section does an inadequate job of describing what actually happened; the reviewer should not have to read through the entire document, including appendices, to understand what happened. Page numbers through the main text of the report would be very helpful.

Implementation of Technology Demonstration for SWMU 14: Concrete Surfaces

General - Many of the referenced tables were not labeled, making it difficult for the reviewer to follow.

Page 2,
Line 13 - "Evaluation" should be "evaluated".

Page 2, A. - The description of the runoff sampling rationale was confusing. Did ABB do all of the spraying or just the spraying used to establish the baseline.

General - There are numerous word processing errors throughout this section that should be fixed. This section reads more like a sales presentation than a serious technical discussion of RHS's process. It would be more useful if it were made more specific to this particular project.

Tab A: Procedure for Bioremediation of Hydrocarbons...NAVSTA Mayport, SWMU 14

General - This section does an inadequate job of describing activities at the site. It would be more comprehensible if the information was organized in a more traditional text and table format, rather than the format used here. At a bare minimum, when this section mentions data found in other parts of this report, then those sections should be referenced.

Page 3 - In section 3.4.2.A, the visual inspection process used to verify that the process was complete is inadequately documented. Without, at a bare minimum, photographs to document the visual inspection, it is difficult for the reviewer to verify the claimed results. The report should also address why this method of verification was chosen instead of a more traditional sampling and analysis approach.

Tab D

General - The first two tables discuss the runoff samples, but the sample results listed on pages 3 and 4 are for soil samples. Should these pages be in Tab C?

Tabs E & F

General - Please clarify the difference between the information contained in these 2 tabs. The titles are identical but the content is not.

If you have any questions about these comments, please call me at 404/562-8533.

Sincerely,



Martha Berry
Remedial Project Manager
Federal Facilities Branch