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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FIELD MANAGEMENT OF INVESTIGATIVE DERIVED WASTE  
ADDITIONAL ASSESSMENT USING INNOVATIVE TECHNOLOGIES NS MAYPORT FL  
11/19/1996  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

November 19, 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

file: 191&15a.doc

RE: Field Management of Investigative Derived Waste (IDW), Additional Assessment Using Innovative Technology/Methodology at the SWMU 15 and Building 191 Area, ICON Environmental Services, NAVSTA Mayport

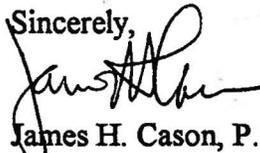
Dear David:

I have reviewed the above document dated October 1996 (received November 13, 1996) and offer the following comments.

1. Section 4.2, Soil Cuttings from Conventional Borings: the use of a PID may not be appropriate for screening of cuttings the Building 191 site and definitely not for the SWMU 15 site. Additionally, I cannot tell from the document how the cuttings will actually be managed.
2. Section 4.3, Groundwater Purge and Development Water: the use of the headspace analysis is not appropriate for field screening of such water, especially at SWMU 15. The contractor should review and be familiar with Department guidance entitled "Management of Contaminated Media under RCRA" dated July 27, 1995, which was given to you at a partnering meeting.
3. The plan does not address the disposition of IDW; will it be the Navy or the contractor that is responsible for the final disposition?

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-9994

Sincerely,



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

Mr. David Driggers  
November 19, 1996  
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cc: Cheryl Mitchell, NAVSTA Mayport  
Martha Berry, EPA Region IV, Atlanta  
Satish Kastury, FDEP, Tallahassee  
Jerry Young, City of Jacksonville

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