

N60201.AR.000399  
NS MAYPORT  
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REVIEW OF PROPOSED MONITORING PROGRAM FOR REFURBISHMENT OF SMALL  
ARMS RANGE NS MAYPORT FL  
9/17/1997  
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

September 17, 1997

Ms. Cheryl Mitchell  
Staff Civil Engineer (Environmental)  
Naval Station Mayport  
Mayport, FL 32229-0067

file: range1.doc

RE: Refurbishment of the Small Arms Range: Proposed Monitoring Program

Dear Cheryl:

Pursuant to your request, I have reviewed the proposed plans and specifications for refurbishing the small arms range at Naval Station Mayport, including the ten graphic sheets produced for the project by AJT and Associates. Mr. David Apple has also reviewed the plans and has indicated to me that a Stormwater Permit is not required. As I have previously discussed with you, my concern has been that particulate lead and metals from the firing process should be addressed so that discharge of contaminants off the site to the adjacent ditch north of the range would not occur; this aspect of the project is the basis for my review.

The proposed design addresses storm water in that the facility is constructed with slopes which divert storm water to a collector drain which discharges into two sequential detention areas with approximately 570 cubic feet of storage, or roughly 0.5 in of rainfall. Discharge in excess of this amount is then discharged by overland flow to the adjacent ditch system. The two detention areas specifically address my concerns regarding particulates in that they allow for sedimentation to occur prior to discharge to the adjacent ditch system.

In order to monitor this facility in the future, I propose that the Navy accomplish the following annual monitoring program:

1. Sample the sediments at three locations in the adjacent storm water ditch; one upstream of the point of discharge of the detention ponds, one at the point of discharge and one downstream of the point of discharge. We should agree on the exact sampling points and I suggest that a pre-construction set of samples be acquired. The sediments should be analyzed for Total Lead and Total Copper by EPA Method 6010, 7421 or other appropriate methods.
2. Sample monitoring well MPT-2-MW02, located immediately northwest of the site, for Total Lead and Copper by EPA Methods 200.7, 200.8, 239.2, 6010 or 7421, or other

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

Cheryl Mitchell  
Page Two  
September 17, 1997

appropriate methods. Sampling conducted as part of the HSWA program at NAVSTA Mayport may be utilized for that information.

3. Evaluation of the monitoring well sample will be accomplished by reference to "Ground Water Guidance Concentrations," FDEP, June 1994. Evaluation of sediment samples will be accomplished by reference to criteria set forth in Table 4 and the general information contained in "Approach to the Assessment of Sediment Quality in Florida Coastal Waters," MacDonald Environmental Sciences, November 1994.
4. The detention areas at the site should receive regular maintenance as part of NAVSTA Mayport's regular ditch/pond maintenance program. At such times that sediment is removed, it should be evaluated for possible hazardous waste status and disposed of accordingly. Maintenance events should be documented in the annual report.
5. After annual sampling of the site, please submit the results of the sediment and ground water sampling, including analysis of any removed detention pond sediments, to myself and to Mr. Ashwin Patel, FDEP Northeast District. A simple letter report will suffice.
6. After two years of sampling, we may want to evaluate extending the sampling times to every other year.

I would appreciate your review and agreement to this monitoring and evaluation program. I think it represents a reasonable approach at monitoring the facility and helping the Navy achieve it's mission at NAVSTA Mayport.

Sincerely,



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

cc: Martha Berry, USEPA, Atlanta  
Robert L. Weaver, AJT & Associates  
Satish Kastury, FDEP, Tallahassee  
Ashwin Patel, FDEP Northeast District  
Jerry Young, City of Jacksonville

TJB  JJC  ESN 