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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT TECHNOLOGY EVALUATION REPORT NAVAL  
ENVIRONMENTAL LEADERSHIP PROGRAM TECHNOLOGY EVALUATION REPORT FOR  
SOLID WASTE MANAGEMENT UNIT 15 NS MAYPORT FL  
10/1/1997  
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

October 1, 1997

Mr. David Driggers  
Department of the Navy, Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive, PO Box 190010  
North Charleston, SC 29419-9010

file: nelp\_S15.doc

RE: Draft Technology Evaluation Report: Naval Environmental Leadership Program  
Technology Evaluation Report for Solid Waste Management Unit 15

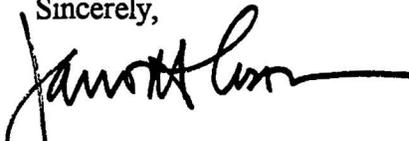
Dear David:

I have reviewed the above document dated June 1997 (received June 25, 1997). I note that although this document is not a typical nor required IRP document, the following comments seem appropriate and should be considered by the Navy:

1. The technology demonstration occurred during the colder Winter months; as such, I am unsure as to the value of any conclusions regarding the efficacy of the technology type. It could be argued that the observed results could result from merely the physical mixing of the site soils or by the "hot spot" nature of the contamination. Accordingly, I must conclude that the demonstration did not adequately establish that the bioremediation method(s) were responsible for any positive observed effects at SWMU 15.
2. This technology would have been better demonstrated on a site where the extent of contamination was more uniform in concentration and areal extent.
3. Because of the variable and questionable nature of the data, does the Navy intend to utilize it in the evaluation of the status at SWMU 15 and if so, how will this will be done?

Thank you for the opportunity to review this document. If you need further clarification or any additional information, please feel free to contact me at 850-921-4230.

Sincerely,



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

Mr. David Driggers

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cc: Martha Berry, USEPA, Atlanta  
Cheryl Mitchell, NAVSTA Mayport  
Satish Kastury, FDEP, Tallahassee  
Jerry Young, City of Jacksonville

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