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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING CORRECTIVE MEASURES STUDY FOR SOLID WASTE
MANAGEMENT UNITS 12 AND 17 NS MAYPORT FL
4/11/2001
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

April 11, 2001

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

file: 12&17cms1.doc

RE: Corrective Measures Study for Solid Waste Management Unit Numbers 12 and 17; Naval Station Mayport, Mayport, Florida

Dear Ms. Wilson:

Mr. Greg Brown, P.G., and I have reviewed the above document dated March 2001 (received April 3, 2001). The Navy should consider the following comments and Mr. Brown's comments that are attached in preparing the final document:

1. As also pointed out by Mr. Brown, lowering the pH of the groundwater at SWMU 12 may increase the metal ion concentration. The remedial action should be carefully considered.
2. Tables 1-1 through 1-5 denote calculated background screening values for several organic constituents and pesticides. We have discussed background and derived screening values only for inorganic materials. The Navy should insure that screening values for organic compounds should not be utilized in the risk evaluation (as was apparently done in Section 2.1.1.3 RFI Assessment of Ecological Impacts and Section 2.4.2 Volume of Groundwater). The Navy should finalize the existing background technical evaluation document so that it can be formally adopted.
3. Section 2.3. Chemicals of Concern-Ecological: the assumption of groundwater dilution as it reached surface water by a factor of 10 is not allowable (no dilution can be assumed). This section should be reevaluated.
4. Section 2.4.2. Volume of Groundwater: the statement is made that "the groundwater was not of ecological concern.." This is not the case since the close proximity of the St. Johns River makes that concern a priority.
5. Section 2.5 Identification and Screening of Corrective Measures Technologies: in paragraph two, the statement is made, "Because there is no soil contamination at SWMU 12..." The Navy is reminded that in the Installation Land Use Control Memorandum of

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Ms. Adrienne Wilson
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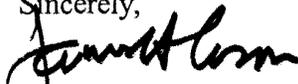
Agreement, the LUCIP for SWMU 12, page C-27, states that the site has land use controls on it based specifically on arsenic in soil. This section should be reevaluated.

6. Section 3.1.2 RFI Evaluation: in the second paragraph, the statement is made that arsenic and beryllium could not be related to releases at SWMU 17. As previously noted for SWMU 12, arsenic is one component of the basis for land use restriction in the LUCIP for SWMU 17 in the Installation Land Use Control Memorandum of Agreement for Mayport Naval Station. Until such time that the Navy can formally relate those contaminants to the dredge material emplacement, arsenic and beryllium should be included in the evaluation.

The Navy should insure that all applicable documentation is reviewed, especially the Land Use Control Memorandum of Agreement and the accompanying LUCIPs, when preparing future Corrective Measures Studies. I respectfully suggest that the Partnering Team review all of the LUCIPs at the June Partnering meeting.

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

Attachment (1)

CC (with Attachment:

Cheryl Mitchell, NAVSTA Mayport
Bill Raspet, NAS JAX
Craig Benedikt, EPA Region IV, Atlanta
Terry Hansen, Tetra Tech, Tallahassee

TJB B JJC JJC ESN ESN

Memorandum

Florida Department of
Environmental Protection

TO: Jim Cason, P.G., Remedial Project Manager, Technical Review Section

Through: Tim Bahr, P.G., Supervisor, Technical Review Section ^B

FROM: Greg Brown, P.E., Professional Engineer II, ^{AB}
Technical Review Section

DATE: April 11, 2001

SUBJECT: Corrective Measures Study for SWMU No. 12 (Neutralization Basin) and SWMU No. 17 (Carbonaceous Fuel Boiler Area), Revision 0, Naval Station Mayport, FL.

I reviewed the subject document dated March 2001 (received April 3, 2001). It is adequate for its intent. I have the following comments, however, for the record and for your consideration:

1. Final engineer documents should be signed and sealed by a Florida licensed professional engineer with responsible charge.
2. The reported groundwater pH of about 11 s.u. at SWMU No. 12 is close to the point of theoretical minimum solubility for the metals of concern (note Appendix F). Lowering the pH would theoretically increase the potential for solubilization of metals rather than decrease it. Basic water quality measurements such as (but not limited to) pH, bicarbonate, carbonate, and hydroxide alkalinity should be obtained before final remedy selection and implementation to confirm the feasibility and effectiveness of proposed alternatives.
3. LUCs have direct administrative expenses as well as opportunity losses. I suggest the Mayport team consider estimating the trade-offs of surface soil remediation at SWMU No. 17 to permit future unrestricted land use verses LUCs. I understand that groundwater restrictions may still likely be necessary. Nonetheless, limited surface soil removal may open up many more beneficial land uses that would be restricted otherwise.

Please call me at (850) 488-3935 if you have any questions.

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