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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY INVESTIGATION FOR AREA OF CONCERN C NS MAYPORT FL
3/8/2002
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

March 8, 2002

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: AOC_C_d1.doc

RE: Draft RCRA Facility Investigation for Area of Concern "C" at Naval Station Mayport,
Mayport, Florida

Dear Ms. Wilson:

I have reviewed the above document dated November 2001 (received November 19, 2001). The document is generally well prepared; however, please adequately address the following comments in preparing the final document:

1. Please add the AOC site boundaries to Figure 1-3. Are the potentiometric contours on Figure 2-1, 2-2 and 2-3 referenced to NGVD? If so, please indicate that they are.
2. In Table 5-5 (and other tables), please adequately discuss instances where analytes exhibited values considerably above the GCTLs (especially those that have Primary Standards, such as vinyl chloride in Table 5-5, where the value is given as <5 ug/L and the GCTL is 1 ug/L and for thallium in Table 5-6, where the GCTL is 2 ug/L and several values are simply given as <7.1 ug/L). In those cases, little or no discussion is found of them either in the risk assessment or in the Conclusions and Recommendations. What is the significance for thallium values when the GCTL is 2 ug/L and most of the data points are given as <7.1 ug/L? Is the reader supposed to assume that <7.1 ug/L actually means zero? What about the fact that there are instances where thallium is found at 10.7 ug/L? Taking that high value into account, I could conclude that <7.1 ug/L actually could mean 7.0 ug/L. Why not? What does it all mean? Note: you may choose to discuss this in a separate appendix if you feel that your discussion has rational applicability to the various data sets.
3. Please discuss and justify why only two surface soil samples were collected for the investigation, given that the AOC is actually composed of three individual sites. You may do this in Section 4.2.1. I recognize that data exists in existing reports for each of those areas; you may want to discuss or briefly summarize those data findings.

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Ms. Adrienne Wilson

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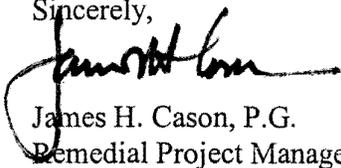
4. Does Figure 5-3 depict groundwater data? If so, please state that in the descriptor. Are we observing data for a possible thallium plume? What would it look like if the thallium (and other inorganic constituent) values given in the context of "<" were added to the figure? We should discuss this Figure at the next Partnering meeting.
5. Please substantiate the statement on page 5-46 where it states, "It is likely that inorganic analytes detected in the groundwater are related to deposition and natural leaching from the dredge spoil material used to construct the land mass at AOC "C." Does this (conveniently) apply to all inorganic analytes?
6. In Section 7.2.1, it states that the tetrachloroethene groundwater contamination is suspected to originate from the former landfill and not (see Section 7.22) from a spill of tetrachloroethene at Building 191. Why, since Building 191 had a documented spill of that compound? You may want to add your response to the paragraph on page 5-2, where this is briefly discussed.
7. Cancer risks may be underestimated by evaluating children and adults separately. The calculation of cancer risks is affected by the exposure duration considered. This is usually addressed, in the case of evaluation of residential exposure, by using an aggregate resident, that is, a person assumed to be exposed during 30 years both as a child, and as an adult. The use of an adult receptor exposed for only 24 years assumes that exposure does not occur during childhood, an assumption not easy to justify for residential settings. In addition, other exposures that change from childhood to adulthood may also contribute to underestimation of risks (soil ingestion and body weight). A solution to this shortcoming would be to add the cumulative doses calculated for the child and adult receptor before calculating cancer risks.
8. A construction worker is also included in the evaluation. Although the exposure assumptions considered are adequate, the frequency of exposure may be too small (20 days per year, with exposure duration of one year). This assumes that workers will be involved in construction activities less than 2 days per month. It is suggested to assume that the frequency of exposure is the default worker frequency of 250 days/year and assume that the construction project will last only one year. If specific plans for construction have been advanced, then a more realistic frequency and duration of exposure could be used based on the expected duration of the project.
9. On page 8-2, following the last "bullet," I suggest a subheading of "Recommendations" be included before the last two paragraphs.
10. Figure 3-1 is referenced on page 8-1. Where is Figure 3-1? Did you mean to reference Figure 4-1?

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11. Please prepare a construction schedule (table) that provides monitoring well construction details for all wells. A geological cross-section is also needed, given the relationship of the AOC to the Turning Basin and the associated sheet pilings/concrete retaining walls.

I appreciate 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

CC: Cheryl Mitchell, Mayport Naval Station
Craig Benedikt, EPA Region IV, Atlanta
Terry Hansen, Tetra Tech, Tallahassee

TJB JJC ESN