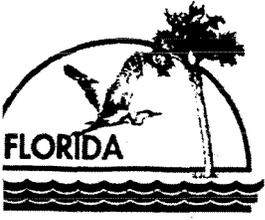


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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING CORRECTIVE MEASURES STUDY FOR SOLID WASTE  
MANAGEMENT UNITS 1, 23, 24 AND 25 NS MAYPORT FL  
7/30/2003  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

JEO BUSH  
Governor

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

David B. Struhs  
Secretary

July 30, 2003

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: letal\_cms1.doc

RE: Corrective Measures Study for Solid Waste Management Unit Numbers 1, 23, 24 and 25;  
U.S. Naval Station Mayport, Florida

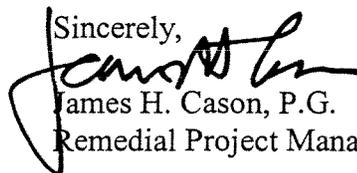
Dear Ms. Wilson:

Mr. Greg Brown and I have reviewed the above document dated June 2003 (received June 9, 2003). Mr. Brown's comments are attached. My comments follow. Please address all comments in the final document.

1. On page ES-3, it is stated, "In the vicinity of Building 15, two underground storage tanks with a capacity of 3000 gallons may exist. Additionally, in the Building 25 area, a 4000 gallon underground storage tank was reportedly replaced because it was leaking (Kearney 1989)." Please document the measures that were taken to address these items, because as written, it appears that they were not addressed.
2. I echo Mr. Brown's concern regarding groundwater discharge. That aspect should be addressed sufficiently to exclude the "dilution" argument in that discussion.

If you need further clarification please feel free to contact me at 850-245-8999.

Sincerely,

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

Attachment (1)

CC: Cheryl Mitchell, NAVSTA Mayport  
Terry Hansen, TetraTech, Tallahassee  
Craig Benedikt, EPA Region IV, Atlanta

TJB  JJC  ESN 

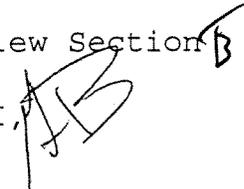
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## Memorandum

# 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 

FROM: Greg Brown, P.E., Professional Engineer II, Technical Review Section

DATE: July 28, 2003

SUBJECT: Draft Corrective Measures Study for SWMU Nos. 1, 23, 24, and 25, Naval Station Mayport, Florida.

I reviewed the subject document dated June 2003 (received June 9, 2003). It is generally adequate for its intent. I have the following minor comments for your consideration.

1. The final document should be signed and sealed by the engineer with responsible charge per Florida Chapter 471, F.S., and Rule 61-G15, F.A.C.
2. Section 2.3, Contaminants of Concern in Soil - Ecological (and other locations through out the report); This section states, "This is based on the assumption that the groundwater concentration at the surface water discharge point will be lower than the concentration measured in the well, due to advection, dispersion, mixing, and retardation." Evidence based on either empirical observations or theoretical relations (e.g., models) should be provided to substantiate this assumption. Presentation of this evidence does not have to be complex or extensive but reasonable enough to support the assumption (e.g., monitoring data from groundwater wells nearest likely surface water receptors or a simple fate and transport screening model.)
3. Section 2.4, Volumes of Contaminated Media - Soil (and other locations through out the report); a risk management decision was made during the RFI to assume industrial land-use. No COCs were identified using industrial risk-based CTLs. Nonetheless, those compounds that exceed residential CTLs but are below industrial CTLs should be noted in the LUCIP for reference in the future when land use may change to less restrictive activities.

Please call me if you have questions at (850) 245-8993.

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