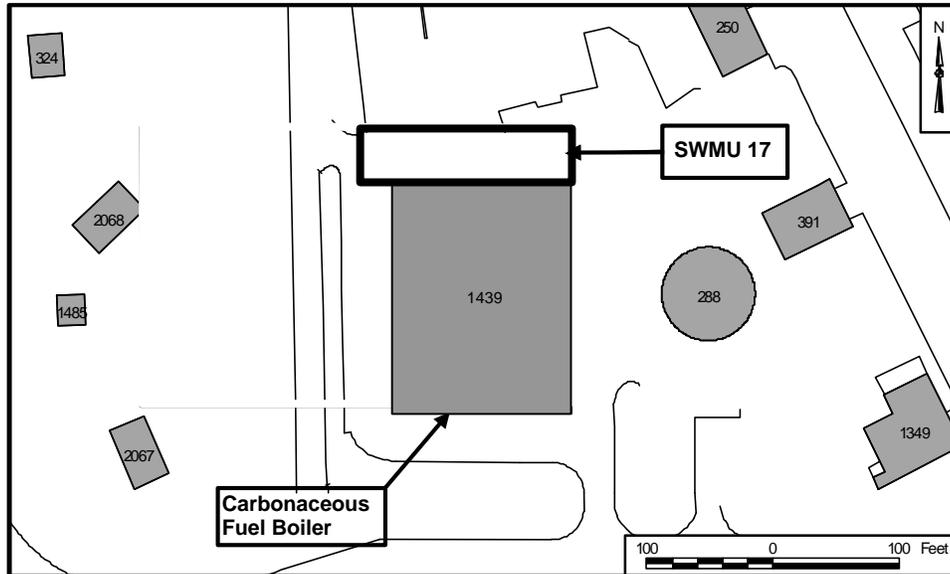


N60201.AR.000724
NS MAYPORT
5090.3a

STATEMENT OF BASIS FOR SOLID WASTE MANAGEMENT UNIT 17 CARBONACEOUS
FUEL BOILER AREA NS MAYPORT FL
5/24/2004
NAVAL STATION MAYPORT

STATEMENT OF BASIS
SWMU 17 – Carbonaceous Fuel Boiler Area
Naval Station Mayport
Mayport, Florida



SUMMARY

The proposed corrective measure for Solid Waste Management Unit (SWMU) 17 at the Naval Station (NAVSTA) Mayport is soil capping, Land Use Controls (LUCs), and site monitoring for soil and Monitored Natural Attenuation (MNA) and LUCs for groundwater. SWMU 17 has been impacted by low concentrations of benzo(a)pyrene and dieldrin in soil and ammonia, manganese, and iron in groundwater. LUCs will be implemented to prevent the site from being used for residential purposes and the groundwater from being used for potable uses, thus controlling the exposure pathways to the soil and groundwater. Monitoring will be used to track the progress of contaminant degradation in groundwater. In addition, an impermeable (i.e., concrete/asphalt) cover will be added to surface soil areas where the concentrations of contaminants exceed the Florida Department of Environmental Protection's (FDEP's) Soil Cleanup Target Levels (SCTLs) for future industrial use and for the protection of groundwater.

The public is invited to comment on this proposed remedy or any other corrective measure alternative including those not previously studied. Information on how the public may participate in this decision-making process is provided in the Public Participation section of this document.

INTRODUCTION

Pursuant to the Resource Conservation and Recovery Act (RCRA), as amended by the 1984 Hazardous and Solid

Waste Amendments (HSWA), the United States Environmental Protection Agency (EPA) issued a HSWA permit to NAVSTA Mayport, effective June 15, 1993, to address corrective action at the facility and required NAVSTA Mayport to conduct a RCRA Facility Investigation (RFI) to determine the nature and extent of contamination at SWMU 17. At that time EPA served as the lead regulatory agency for corrective action oversight. In November of 2000, HSWA authority was delegated to the State of Florida. The Florida Department of Environmental Protection (FDEP) is the regulatory agency in accordance with a State HSWA permit issued to NAVSTA Mayport. The FDEP will perform the technical reviews of documents submitted under the HSWA permit and will provide its comments and recommendations to the EPA for forwarding to the Navy.

This Statement of Basis identifies the proposed corrective measure for SWMU 17 and explains the rationale for its selection; describes all alternatives evaluated as part of the Corrective Measures Study (CMS); solicits public review and comment on all alternatives, including those not previously studied; and provides information as to how the public can be involved in the remedy selection process. Additional details regarding the facility, the investigation conducted under the RFI, and the evaluation of the corrective measure alternatives may be found in the RFI and CMS Reports. These documents are kept as part of the Administrative Record at the Information Repository. Refer to the Public Participation section of this document for their location. A glossary, which defines

**Statement of Basis – SWMU 17
NAVSTA Mayport, Florida**

some of the technical terms contained herein, is included at the end of this document.

The corrective measures reflected in this Statement of Basis are those proposed by the Navy, EPA, and FDEP for implementation at SWMU 17. Changes to the proposed corrective measure, or a change from the proposed corrective measure to another alternative, may be made if public comments or additional data indicate that such a change would result in a more appropriate solution.

PUBLIC PARTICIPATION

To make a final decision and incorporate a corrective measure into the HSWA permit, the FDEP is soliciting public review and comment on this Statement of Basis for the proposed corrective measure for SWMU 17 at NAVSTA Mayport. The regulations under 40 *Code of Federal Regulations* (CFR) 124.10(6) require a 45-day comment period for a permit modification request made by the permittee under RCRA. The FDEP has undertaken the lead role on this request initiated by the Navy (the permittee). The comment period will begin on [Sunday, July 7, 2002](#), which is the date of publication of the public notice in the *Florida Times Union* newspaper, and will end on [Friday, August 21, 2002](#).

Copies of the RFI and CMS Reports and the Statement of Basis will be available for public review at the Information Repository located at the Jacksonville Public Library - Beaches Branch, 600 3rd Street, Neptune Beach, FL, 32266 [Phone (904) 241-1141].

A public hearing will be held if one is requested. To request information about a public meeting or about the comment period, to obtain more information about this Statement of Basis, or to submit written comments, please contact: James Cason, FDEP, Twin Towers Office Building, Technical Review Section, 2600 Blair Stone Road, Tallahassee, FL, 32399-2400, [Phone (850) 245-8999 or Fax (850) 245-8703].

All comments must be postmarked no later than [Friday, August 21, 2002](#).

Next Steps

Following the public comment period, the FDEP will modify the HSWA permit to incorporate the final decision on the RCRA permit modification request. The final decision will detail the corrective measure chosen for SWMU 17 and will include responses to comments received during the public comment period in a Response to Comments.

When the permit is modified, notice will be given to the Navy and to each person who has submitted written comments or who has requested notice of the final decision. The final permit decision shall become effective 30 days after the issuance of the notice of the decision unless a later date is specified or review is requested under 40 CFR 124.19. If no comments are received requesting a change in the draft permit, the final permit

modification shall become effective immediately upon issuance.

Contact Persons

NAVY

Diane Lancaster
Environmental Division
Public Works Office
Naval Station Mayport
Mayport, FL 32228-0067
(904) 270-6730, ext. 208

FDEP

James Cason
FDEP, Twin Towers Office Building
Technical Review Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400
(850) 245-8999 or Fax (850) 245-8703

PROPOSED CORRECTIVE MEASURES

The proposed corrective measure for soil includes providing an impermeable (i.e., concrete/asphalt) cover over the contaminated surface soil areas not presently covered to limit exposure and to minimize the transport of the contaminants to groundwater through percolation, imposing LUCs in the form of a cap/soil disturbance prohibition, and site monitoring to ensure LUCs remain in place. The estimated capital cost for the proposed soil corrective measure is \$104,000 with an annual operation and maintenance cost of \$4,000 and an additional \$7,000 for each 5-year review. The present worth cost over a period of 30 years is \$168,000.

The proposed corrective measure for groundwater includes MNA, LUCs, and site monitoring. The LUCs would prohibit the use of the groundwater for drinking water and restrict future development of the site until MNA or any future active corrective measure allows for unrestricted use. The estimated capital cost for the proposed groundwater corrective measure is \$38,000 with an annual operation and maintenance cost of \$35,000 and an additional \$7,000 for each 5-year review. The present worth cost over a period of 30 years is \$325,000.

To implement the LUCs, a Land Use Control Implementation Plan (LUCIP) will be developed by the Navy for this site. The LUCIP will be approved by the FDEP and will serve as the Corrective Measures Implementation Plan as required to implement a corrective measure, pursuant to the requirements of RCRA.

FACILITY BACKGROUND

NAVSTA Mayport is located near the town of Mayport within the city limits of Jacksonville, Florida, in northeastern Duval County on the south shore of the confluence of the St. Johns River and the Atlantic Ocean (Figure 1). SWMU 17, the Carbonaceous Fuel Boiler

Figure 1. Naval Station Mayport Location Map

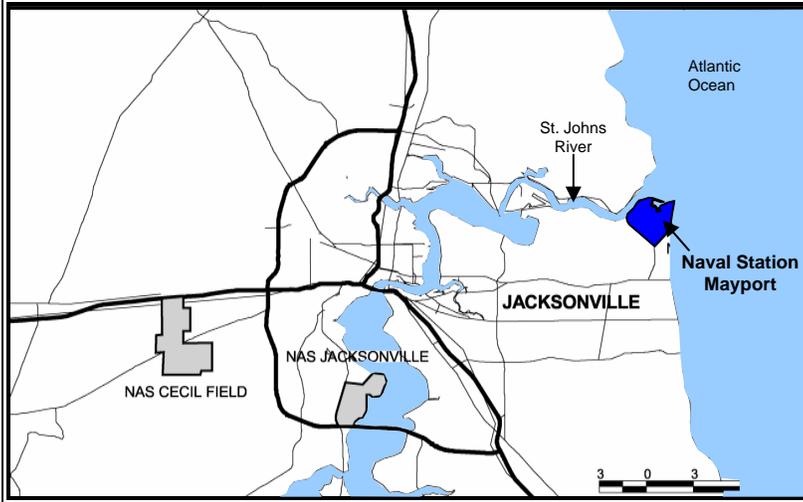
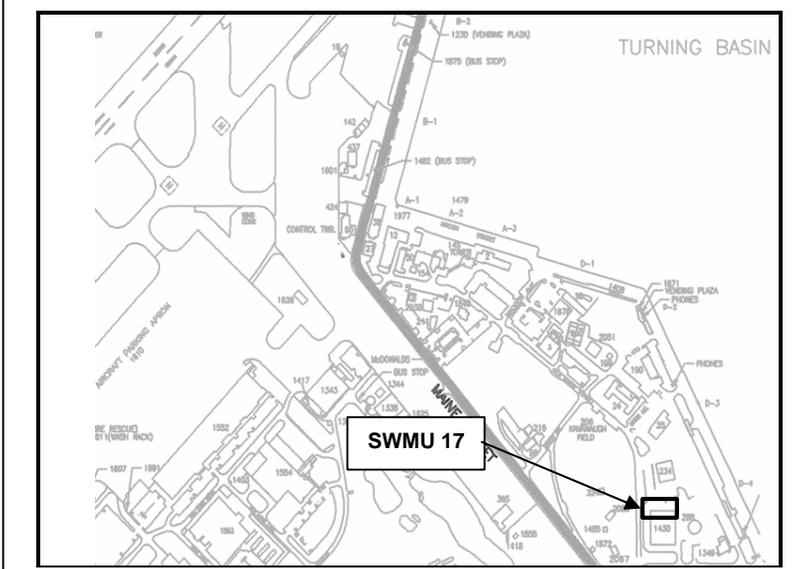


Figure 2. SWMU 17 Location Map



(CFB), is located in the central part of NAVSTA Mayport (Figure 2). The SWMU 17 is located southwest of the Mayport Turning Basin, approximately 350 feet west of Echo Pier.

The CFB was a furnace fueled by domestic solid waste from both the NAVSTA Mayport fleet and the housing area within the station. The CFB also burnt waste oil collected from various locations within the station as well as oil recovered from bilge water by the oily waste treatment plant. Waste oil and diesel fuel were stored at the CFB in two 6,000-gallon underground storage tanks (USTs) and two 550-gallon USTs, respectively. The CFB was operated 24 hours a day from 1979 to mid-1994, at which time it was taken out of service.

The RCRA Facility Assessment report identified the CFB as a SWMU because fly ash was being stored on the north side of the CFB building and a small amount of ash was noted to be piled on the asphalt near a roll-off container. Quenched ash when tested did not exceed the

Federal regulatory criteria for hazardous waste using the Toxicity Characteristics Leaching Procedure test. However, the fly ash exceeded the Federal regulatory criteria for lead and cadmium using the toxicity test. From March through October 1995, an RFI was conducted to delineate the nature and extent of contamination.

SUMMARY OF FACILITY RISKS

A Human Health Baseline Risk Assessment and an Ecological Risk Assessment were performed as part of the RFI. An exceedance of an FDEP or EPA risk level indicates a potential concern for the SWMU.

Human Health Risk Assessment

Preliminary risk characterization for SWMU 17 was conducted for potential exposures to soil and groundwater under current and future land-use scenarios.

Soil. The cancer risk for site workers associated with surface soil, under the current industrial land use, slightly exceeded the FDEP acceptable risk level and was within EPA's acceptable risk range. The cancer risks for hypothetical future residents exceed both FDEP's and EPA's acceptable risk levels.

Noncancer risks associated with the exposure to surface soil for current industrial land use (adolescent trespasser, adult trespasser, and excavation worker) and for future land use (child resident, adult resident, occupational worker, and site maintenance worker) were all below both EPA's and FDEP's target Hazard Index (HI).

The risks associated with the exposure to subsurface soil were all below both EPA's and FDEP's acceptable risk levels for all land use scenarios.

Groundwater. The cancer risk associated with hypothetical future ingestion of groundwater equaled FDEP's target cancer risk levels and was within EPA's acceptable risk range. Noncancer risk associated with groundwater ingestion were below both FDEP's and EPA's requirements.

RFI Assessment of Ecological Impacts

The ecological risk assessment evaluated risks to aquatic life associated with exposure to contamination in surface soil and groundwater.

Soil. Exposure of terrestrial receptors to potential contamination in surface soil was not evaluated in the RFI due to the lack of habitat (i.e., a majority of the site is paved with asphalt) and industrial land use. No pathway for ecological exposure to subsurface soils was identified.

Groundwater. The concentrations of iron in groundwater exceeded both the Florida surface water quality standard and the lowest reported adverse effect concentration for

**Statement of Basis – SWMU 17
NAVSTA Mayport, Florida**

population growth. The RFI recognized that the concentrations of iron from background monitoring wells used in the RFI also exceeded the toxicity benchmarks. Actual exposure concentrations were considered to be less than the maximum detected concentrations due to groundwater transport mechanisms such as dispersion, mixing, and retardation and because the analyses of total unfiltered samples used in the evaluation included both the biologically available dissolved fraction and any unavailable nondissolved phase present in the groundwater. Thus, the discharge of iron in groundwater to surface water was not expected to present a risk for aquatic receptors.

INTERIM MEASURES

LUCs were implemented as an interim measure after the completion of the RFI to restrict the SWMU to current industrial use.

SCOPE OF THE CORRECTIVE ACTION

Contaminants in soil that exceed the residential soil cleanup target levels in Chapter 62-777 *Florida Administrative Code* (SCTLs) are arsenic, benzo(a)-anthracene, benzo(a)pyrene, benzo(b)-fluoranthene, dibenzo(a,h)-anthracene, 4,4'-DDE, dieldrin, and indeno(1,2,3-cd)pyrene. Contaminants in groundwater that exceed the groundwater cleanup target levels in Chapter 62-777, *Florida Administrative Code* (GCTLs) are iron, manganese, and ammonia. As such, any remedy implemented at SWMU 17 that does not achieve unrestricted future use of the site must include LUCs to restrict the future use of the SWMU to nonresidential.

The future use of the SWMU is to remain industrial. The contaminants in soil that exceeded the industrial SCTLs include benzo(a)pyrene and dieldrin in soil.

Impacted soil thickness ranged from the surface to 2 feet. The total area of soil contamination was estimated to be 15,700 ft² with an estimated volume of 1,165 cubic yards (Figure 3).

The estimated volume of groundwater contamination is approximately 9,700,000 gallons (estimated area of 87,800 ft²) of iron- and manganese-contaminated groundwater and 1,900,000 gallons (estimated area of 17,400 ft²) of ammonia-contaminated groundwater (Figure 4).

SUMMARY OF ALTERNATIVES

An evaluation of the corrective measure alternatives for SWMU 17 was conducted in accordance with the EPA Final RCRA Corrective Action Plan Guidance as follows:

Soil Alternatives

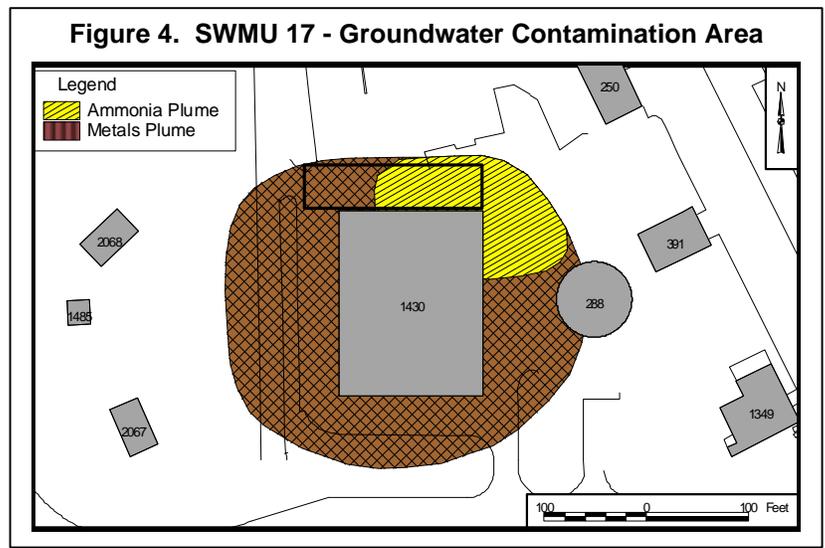
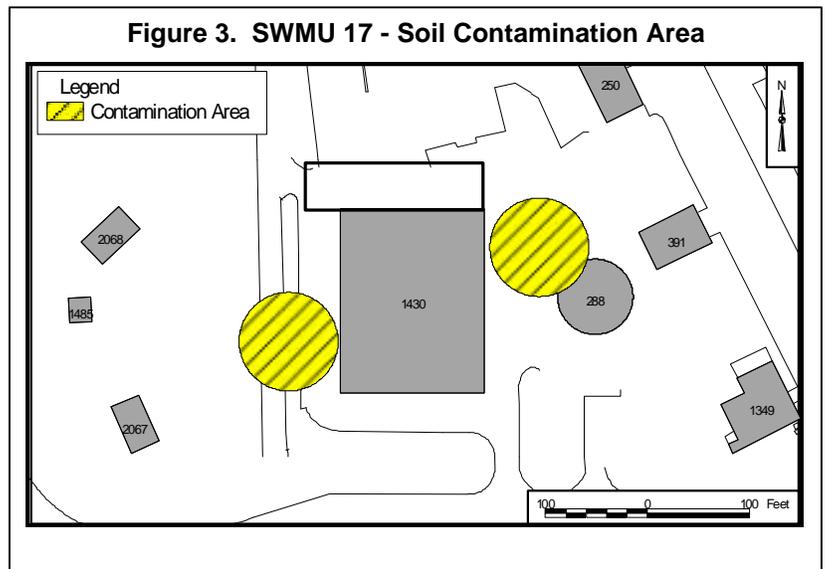
Soil Alternative 1: No Action. The No Action alternative serves as a baseline consideration or

addresses sites that do not require remediation. The No Action alternative includes costs for conducting 5-year reviews over a 30-year period.

Soil Alternative 2: LUCs and Site Monitoring. This alternative would implement LUCs in the form of a soil disturbance prohibition. Once implemented, site monitoring would take place to ensure that the implemented LUCs were being maintained.

The implemented LUCs would serve to both protect human health by precluding residential exposure to contamination and prevent contaminant migration to other areas of the base. LUC implementation would occur via preparation of a site-specific LUCIP that would describe the site location, the prohibition itself, its objectives, and other pertinent information. The LUC would provide for certain periodic site inspection and reporting requirements.

Soil Alternative 3: Capping, LUCs, and Site Monitoring. This alternative would address the principal threats posed by contaminated soil through an impermeable cover that would protect humans and ecological receptors from



direct contact and would also prevent infiltration. This would also reduce the potential for contaminants to leach into the underlying aquifer. LUCs and monitoring would be identical to those discussed under Soil Alternative 2.

Capping involves covering those areas not presently covered with a water-resisting and impermeable layer of asphalt. The estimated area requiring capping is approximately 6,500 ft².

Soil Alternative 4: Excavation, Disposal, and LUCs. Soil Alternative 4 would reduce long-term management by addressing contaminated surface soil through excavation and disposal. LUCs and monitoring would be identical to those discussed under Soil Alternative 2. This alternative would offer aggressive remediation through excavation and transportation of contaminated soil to a hazardous waste landfill. An estimated 1,165 cubic yards of soil would be excavated for disposal.

Excavation would involve the removal of the top 2 feet of soil, that exceeds industrial SCTLs and is not presently covered, for disposal in an approved offsite facility.

Groundwater Alternatives

Groundwater Alternative 1: No Action. The No Action alternative serves as a baseline consideration or addresses sites that do not require remediation. The No Action alternative includes costs for conducting 5-year reviews over a 30-year period.

Groundwater Alternative 2: MNA, LUCs, and Site Monitoring. This alternative would impose a LUC in the form of a groundwater use prohibition. Once implemented, site monitoring would take place to assess

natural attenuation and contaminant migration and to ensure that the implemented LUCs would be maintained.

The imposition of a groundwater LUC would serve to both protect human health by precluding exposure to contamination and would also serve to prevent contaminant migration to an underlying aquifer. LUC implementation is discussed under Soil Alternative 2.

Groundwater Alternative 3: Extraction, Ex Situ Treatment, Discharge, LUCs, and Site Monitoring. This alternative would address the contaminated water through ex situ treatment using greensand filtration for metals removal and treatment in NAVSTA Mayport’s sewage treatment plant for ammonia removal. LUCs and monitoring would be identical to those discussed under Groundwater Alternative 2.

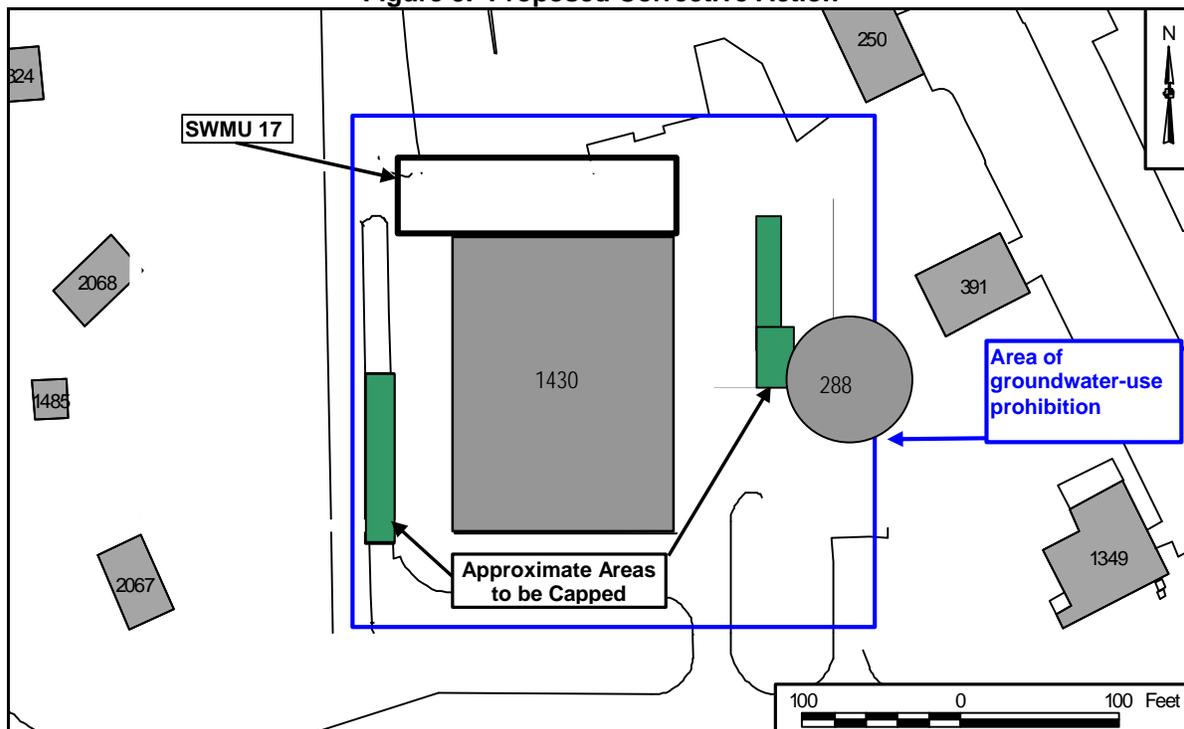
An estimated 59.1 million gallons of groundwater would be extracted, passed through a liquid-phase treatment system, and discharged to NAVSTA Mayport’s sewage treatment plant.

Greensand filtration is an oxidation filtration process used for the treatment of iron and manganese. The greensand filtration medium is produced by treating glauconite sand with potassium permanganate until the granular material (sand) is coated with a layer of manganese oxides, particularly manganese dioxide. Iron and manganese are reduced through a combination of oxidation, ion exchange, and particle entrapment.

EVALUATION OF THE PROPOSED REMEDIES AND ALTERNATIVES

The identified corrective measure alternatives were

Figure 5. Proposed Corrective Action



evaluated using the criteria contained in the Final RCRA Corrective Action Plan (EPA, May 31, 1994. OSWER Directive 9902.3-2A). Four criteria and five other factors were used to evaluate the corrective measure alternatives. These criteria and factors are:

Criteria

- Protect Human Health and the Environment
- Attain Media Cleanup Standards
- Source Control
- Comply with Waste Management Standards

Other Factors

- Long-Term Reliability and Effectiveness
- Reduction in Toxicity, Mobility, or Volume
- Short-Term Effectiveness
- Implementability
- Cost

Tables 1 and 2 depict the evaluation of the corrective measure alternatives as performed in the CMS Report.

RECOMMENDATIONS

Based on the screening of technologies and assessment of various alternatives performed, Soil Alternative 3 is

recommended for addressing the soil contamination and Groundwater Alternative 2 is recommended for addressing the groundwater contamination (see Figure 5).

The preferred soil corrective measure alternative involves placing an impermeable cap on the surface soil areas that exceed the cleanup levels and are not presently covered to prevent direct contact and leaching.

LUCs would be implemented in the form of a soil disturbance prohibition and individual contact reduction. Soil Alternative 3 is moderately aggressive in addressing the contamination and should provide a cost-effective corrective measure in approximately 1 year.

The preferred groundwater corrective measure alternative involves LUCs and site monitoring to address limited groundwater contamination, and monitored natural attenuation (MNA). Groundwater Alternative 2 relies on natural attenuation, the progress of which would be monitored by the periodic sampling. The ammonia, iron, and manganese would be monitored across the site as well as in downgradient wells as part of the monitoring program. LUCs would prohibit the use of groundwater for residential purposes.

TABLE 1. EVALUATION OF SOIL/SEDIMENT CORRECTIVE MEASURE ALTERNATIVES FOR SWMU 17

Soil Alternative 1: No Action	Soil Alternative 2: LUCs and Site Monitoring	Soil Alternative 3: Capping, LUCs, and Site Monitoring	Soil Alternative 4: Excavation, Disposal, and LUCs
Protect Human Health and the Environment			
Would not be protective.	Soil contaminants would continue to leach to the groundwater.	Would prevent direct human or ecological contact with soil and prevent potential leaching.	All organic contaminants would be eliminated through excavation.
Attain Media Cleanup Standards			
Would not attain.	Natural processes would reduce contaminants to acceptable levels in greater than 30 years.	Would prevent the risk of direct exposure and the leaching to groundwater. Attains standards in less than 1 year.	Removal would attain cleanup standards in less than 1 year.
Source Control			
No new source control would be implemented.	Natural processes would not provide source control.	A cap would control the source of contamination from further leaching.	Excavation and disposal of the contaminated soil would eliminate the source.
Waste Management Standards			
No waste would be generated.	No standards for management of wastes would apply.	Waste would be properly disposed of in accordance with applicable State, Federal, and local regulations.	Waste would be properly disposed of in accordance with applicable State, Federal, and local regulations.
Long-Term Reliability and Effectiveness			
Residual contamination and existing risks would remain.	Contaminants may continue to leach to the groundwater from the areas not covered.	A cap would provide long-term reliability and effectiveness.	The degree of long-term reliability and effectiveness would be high.
Reduction in Toxicity, Mobility, or Volume through Treatment			
Reduction of toxicity would occur through natural processes but would not be monitored.	Reduction of toxicity would occur through natural processes over a long period of time.	A cap would reduce mobility. Toxicity or volume would be reduced through natural processes.	Mobility of all contaminants would be reduced through excavation.
Short-Term Effectiveness			
No short-term risks.	No short-term risks.	Short-term risk would be controllable.	Short-term risk would be controllable but dust would be of concern during construction.
Implementability			
Would be readily implementable.	Would be readily implementable.	Would be readily implementable.	Would be implementable.
Cost (Total Present Worth)			
\$18,000	\$85,000	\$168,000	\$761,000

Shading indicates Proposed Alternative.

TABLE 2. EVALUATION OF GROUNDWATER CORRECTIVE MEASURE ALTERNATIVES FOR SWMU 17

Groundwater Alternative 1: No Action	Groundwater Alternative 2: MNA, LUCs, and Site Monitoring	Groundwater Alternative 3: Extraction, Ex Situ Treatment, Discharge, LUCs, and Site Monitoring
Protect Human Health and the Environment		
Not protective	Would be protective	Would be protective
Attain Media Cleanup Standards		
Would not comply.	Natural processes would attain standards in 20-25 years after the soil source area is controlled.	Groundwater extraction would attain standards in approximately 8 years.
Source Control		
No new source control would be implemented.	No new source control would be implemented.	Groundwater extraction and treatment would eliminate the groundwater contamination.
Waste Management Standards		
No standards applicable.	Waste would be disposed of in accordance with applicable State, Federal, and local regulations.	Waste would be disposed of in accordance with applicable State, Federal, and local regulations.
Long-Term Reliability and Effectiveness		
Contamination and existing risks would remain.	Natural processes would offer long-term reliability and effectiveness.	Would provide long-term reliability and effectiveness.
Reduction in Toxicity, Mobility, or Volume through Treatment		
No reduction.	Natural processes would reduce toxicity.	Treatment would reduce toxicity, mobility, and volume.
Short-Term Effectiveness		
Would not pose new risk.	Short-term risks would be minimal.	Short-term risks would be controllable.
Implementability		
Would be readily implementable.	Would be readily implementable.	Would be implementable.
Cost (Total Present Worth)		
\$18,000	\$325,000	\$1,111,000

Shading indicates Proposed Alternative.

ACRONYMS AND ABBREVIATIONS

62-777	Chapter 62-777 Florida Administrative Code	LUCIP	Land Use Control Implementation Plan
CFR	<i>Code of Federal Regulations</i>	MNA	Monitored Natural Attenuation
CMS	Corrective Measures Study	MOA	Memorandum of Agreement
EPA	U.S. Environmental Protection Agency	NAVSTA	Naval Station
F.A.C.	Florida Administrative Code	ORC [®]	Oxygen Release Compound [®]
FDEP	Florida Department of Environmental Protection	OSWER	Office of Solid Waste and Emergency Response
ft ²	square feet	RCRA	Resource Conservation and Recovery Act
ft ³	cubic feet	RFI	RCRA Facility Investigation
GCTL	groundwater cleanup target level, Chapter 62-777, F.A.C.	SCTL	soil cleanup target level, Chapter 62-777, F.A.C.
HSWA	Hazardous and Solid Waste Amendments	SWMU	Solid Waste Management Unit
LUC	Land Use Control	TPH	total petroleum hydrocarbons
		yd ³	cubic yards

GLOSSARY

Aquifer: An underground layer of rock, sand, or gravel capable of storing and transmitting water within cracks and pore spaces, or between grains.

Corrective Measure: The actual construction or cleanup phase following the selection of cleanup alternatives.

Corrective Measure Design: The cleanup phase where engineers design technical specifications for cleanup remedies.

Corrective Measures Study (CMS): An engineering analysis and report identifying and evaluating the most appropriate technical approaches for addressing contamination at a site.

Florida Department of Environmental Protection (FDEP): State FDEP offices or their counterparts implement State or Federal environmental laws.

Groundwater: Water found within an aquifer.

Hazardous and Solid Waste Amendments (HSWA): Amendments to RCRA, passed in 1984, which greatly expand the nature and complexity of activities covered under RCRA. They include the Federal Underground Storage Program.

Human Health Baseline Risk Assessment: Study to determine the likelihood that a given exposure or series of exposures may have damaged or will damage the health of individuals.

Information Repository: A public file containing technical reports, reference documents, and other materials relevant to the site cleanup.

Interim Measure: An action taken to address a release or potential release of hazardous substances posing immediate danger to human health or the environment.

Land Use Control (LUC): Is broadly interpreted to mean any restriction or control arising from the need to protect human health and the environment, that limits use of and/or exposure to any portion of that property, including water resources. This term encompasses institutional controls, such as those involving real estate interests, governmental permitting, zoning, public advisories, deed notices, and other legal restrictions. The term may also include restrictions on access, whether achieved by means of engineered barriers such as a fence or concrete pad, or by human means, such as the presence of security guards. Additionally, the term may involve both affirmative measures to achieve the desired restriction (e.g., night lighting of an area) and prohibitive directives (e.g., no drilling of drinking water wells).

LUC Implementation Plan (LUCIP): A written plan, normally developed after a decision document that required one or more LUCs, for some particular area (operable unit, contaminated unit, and/or solid waste management unit). The LUCIP (1) identifies each LUC objective for that area (e.g., to restrict public access to the area for recreational use) and (2) specifies those actions required to achieve each identified objective (e.g., install/maintain a fence, post warning signs, record notice in deed records). LUCIPs specify what must be done to impose and maintain the required LUCs and are therefore analogous to design and/or operation and maintenance plans developed for active remedies.

Monitored Natural Attenuation (MNA): Assessment of the natural processes that cleanup or attenuate pollution in groundwater.

Permit: A RCRA permit, issued for Mayport, establishes the facility's operating conditions for managing hazardous waste.

Public Comment Period: A legally required opportunity for the community to provide written and oral comments on a proposed environmental action at a hazardous waste site.

RCRA Facility Investigation (RFI): Evaluates the nature and extent of the releases of hazardous waste.

Resource Conservation and Recovery Act (RCRA) of 1976: Requires each hazardous waste treatment, storage, and disposal facility to manage hazardous waste in accordance with a permit issued by the EPA or a State agency that has a hazardous waste program approved by the EPA.

Response to Comments: A document summarizing the public comments received and the responses to the comments.

Risk Assessment: A study estimating the potential risk from a site to human health and the environment.

Solid Waste Management Unit (SWMU): Any discernable unit (to include regulated units) at which RCRA solid waste has been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste.

Statement of Basis: A public participation document detailing the preferred response action at a site.

United States Environmental Protection Agency (EPA): EPA is the Federal agency responsible for implementing environmental laws enacted by Congress.

**Comments on Statement of Basis for the
Carbonaceous Fuel Boiler Area (SWMU 17)**

Place
Stamp
Here

James Cason
FDEP, Twin Towers Office Building
Technical Review Section
2600 Blair Stone Road
Tallahassee, FL 32399-2400