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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT FINAL STATEMENT OF BASIS FOR SOLID WASTE
MANAGEMENT UNIT 1 NS MAYPORT FL
3/25/2008
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 25, 2008

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

**RE: Statement of Basis, Solid Waste Management Unit 1 – Landfill A, Naval Station
Mayport, Mayport, Florida, Draft-Final Rev. 2**

Dear Ms. Wilson:

I have reviewed the subject document dated June 29, 2007 (received February 18, 2008). My comments concerning this Statement of Basis (SB) for Solid Waste Management Unit (SWMU) 1 are below.

1. FDEP feels that land use controls (LUCs) to prevent disturbance of subsurface soils be considered along with the surface soil prohibition. Typically, old landfills that are no longer in use are not fully characterized so there may be unknown risks associated with subsurface soils. **Summary, Page 1, Column 1:** Please discuss the likelihood of contaminants leaching from soils to the groundwater.
2. **Summary, Page 1, Column 1:** The second sentence should read "SWMU 1, the former Landfill A, is located in the vicinity of the Administrative Building of the former Jacksonville Shipyards, Inc., near Bon Homme Richard Avenue.
3. **Summary, Page 1, Column 1:** The seventh sentence should read... "LUCs will restrict the site to non-residential land use only, and will also prohibit any soil disturbance, excavation, or removal activities unless prior written approval is obtained from the NAVSTA Mayport Environmental Department in accordance with the NAVSTA Mayport excavation permit process."
4. **Summary, Page 1, Column 2:** The first sentence of the second paragraph should read... "LUCs for groundwater will prohibit groundwater use/extraction, and will also prohibit any interference with groundwater monitoring systems at SWMU 1". Please make this same change in the **Proposed Corrective Action Section, Column 1, Paragraph 2** ("LUCs for groundwater will prohibit groundwater use/extraction, and will also prohibit any interference with groundwater monitoring systems at the SWMU").
5. **Proposed Corrective Action, Page 2, Column 1:** Please substitute the word "unauthorized" for the word "uncontrolled" when discussing surface soil disturbances. This change should also be made in the **Summary of Alternatives and Recommendations** sections.

6. **Proposed Corrective Action, Page 2, Column 1:** The first sentence of the first paragraph should read... "The proposed corrective measure for surface and subsurface soil includes imposing LUCs to restrict the site to non-residential use only, and it would also prohibit any unauthorized surface and subsurface soil disturbance."
7. **Proposed Corrective Action Page 2, Column 1:** Please review the present worth cost information in this Section. Any corrections in the text should also be reflected in the Evaluation of Alternatives Tables.
8. **Proposed Corrective Action, Page 2, Column 1:** When discussing the COCs in groundwater please substitute the word "attenuation" for "degradation". This correction should also be made in the **Summary of Alternatives** and **Recommendations** sections
9. **Summary of Facility Risks, Page 3, Column 2:** Please reword the *Groundwater* description as follows: A comparison to FDEP Groundwater Cleanup Target Levels (GCTLs) concluded that antimony, arsenic, silver and zinc are COCs in groundwater for SWMUs 1, 23, 24, and 25. The human health risk assessment concluded that there are cancer and non-cancer risks to human health associated with hypothetical future residents."
10. **Summary of Alternatives, Page 4, Column 1:** Under *Soil Alternative 2*, the first sentence should read... "This alternative would implement LUCs to restrict the site to non-residential land use only, and it would also prohibit any unauthorized surface and subsurface soil disturbance." This change should also be made in the **Recommendations Section** ("Soil Alternative 2 would implement LUCs to restrict the site to non-residential use only, and it would also prohibit any unauthorized surface and subsurface soil disturbance at the SWMU.").

Thank you for the opportunity to review this document. If you require additional clarification or other assistance please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.
Remedial Project Manager

JJC  ESN 

cc Tim Bahr, FDEP, Tallahassee
Diane Racine, NAVSTA Mayport