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NS MAYPORT
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LETTER REGARDING UNIVERSITY OF FLORIDA APPROVAL OF RESPONSE TO
COMMENTS ON ARSENIC BACKGROUND STUDY NS MAYPORT FL
7/28/2008
UNIVERSITY OF FLORIDA

Center for Environmental & Human Toxicology

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Gainesville, FL 32611-0885
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July 28, 2008

Ligia Mora-Applegate
Bureau of Waste Cleanup
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

Re: Response to Comments, Arsenic Background Study, Naval Station Mayport

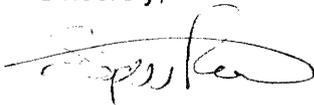
Dear Ms. Mora-Applegate:

In a letter to you dated May 2, 2008, I provided comments on a statistical analysis of site versus background data for arsenic in soil at Naval Station Mayport. In a subsequent conference call on May 28 with Dr. Linda Young (Professor of Statistics at UF) participating, we further explained our concerns regarding the analysis.

TetraTech have substantially revised the analysis and provided responses to our comments in the form of a letter dated June 17, 2008. Dr. Young and I have reviewed the responses and find them to be satisfactory. The revised statistical analysis is now, in our opinion, more technically sound.

Documentation has been provided previously showing that much of Naval Station Mayport is on disturbed soil, and the statistical analysis indicates that the concentrations of arsenic in soil at the site are representative of local background conditions. The maximum arsenic concentration on site is 13.75 mg/kg, while the maximum background concentration is 13.70 mg/kg. The mean arsenic concentration on site, 1.17 mg/kg is somewhat less than the mean arsenic for background samples, 1.80 mg/kg. While arsenic concentrations appear to be higher than in undisturbed, native soil (mean, 0.75 mg/kg; maximum, 1.30 mg/kg), there is no indication that an arsenic spill or discharge to the environment has occurred that would warrant cleanup.

Sincerely,



Stephen M. Roberts, Ph.D.