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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION ON RESPONSE TO COMMENTS REGARDING DRAFT REVISED LONG
TERM MONITORING PLAN FOR REMEDY FOR SOLID WASTE MANAGEMENT UNITS 1
THROUGH 7, 14, 15, 22, 23, 24 AND 25 AND AREA OF CONCERN C NS M

10/19/2010

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

Mimi A. Drew
Secretary

October 19, 2010

Mr. Brian Syme, IPT-South Central, OPC6
Department of the Navy
Naval Facilities Engineering Command Southeast
Naval Air Station Jacksonville
135 Ajax Street, Building 903
Post Office Box 30
Jacksonville, Florida 32212-0030

RE: Response to Comments, Draft Revised Long-term Monitoring Plan for Selected Remedy for Solid Waste Management Units 1 through 7, 14, 15, 22 through 25, and Area of Concern C, Naval Station Mayport, USEPA ID #FL9 170 024 260, Mayport, Florida (Tetra Tech NUS, October 6, 2010)

Dear Mr. Syme:

I have reviewed this Response to Comments letter dated October 6, 2010 which was received by my office on October 7, 2010, and was prepared under Contract Task Order JM32. I am in concurrence with the three responses to comments developed by the Navy and Tetra Tech for the comments brought forth by Ms. Diane Fears who represents Naval Station Mayport concerning the Revised Long-term Monitoring (LTM) Plan (LTMP) for these Solid Waste Management Units (SWMUs) and one Area of Concern (AOC). I am also in concurrence with the responses to comments developed by the Navy and Tetra Tech responding to my comments concerning this LTMP. However, I do have some comments.

My comment to Response 1: While I have reservations with the LTMP, which we have previously discussed at the last Partnering Team meeting, I will concur with it. I still believe that it will not be efficient to conduct several quarters (maybe all four) of groundwater sampling before identifying areas of the sampling plan that need to be changed in order to produce representative data for each SWMU/AOC. So, as discussed, please remember to identify and then answer the questions that I have raised in the past. Preferably, this should be done in the first quarterly groundwater monitoring report that will be produced during this LTM event. These questions are concerning, but are not limited to, the number of monitoring wells being sampled at each of these sites, their screen interval, their relevant location compared to the source of contamination and groundwater flow direction, and the appropriateness of the analyte list for each site.

My comment to Response 2: The response is satisfactory. Please see Chapter 62-780 for a full discussion of the tables that are needed in a groundwater monitoring document.

My comment to Response 3: The response is satisfactory. Please see Chapter 62-780 for a full discussion of the figures that are needed in a groundwater monitoring document.

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Response to Comments, Revised Long-term Monitoring Plan for Selected Remedy
SWMUs 1-7, 14, 15, 22-25, and AOC C
NS Mayport
October 19, 2010

My comment to Response 4: See my comment to Response 1.

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