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LETTER AND CONCURRENCE FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING REMEDIAL ACTION PLAN ADDENDUM FOR ALPHA DELTA  
PIERS NS MAYPORT FL  
10/18/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

October 18, 1994

Mr. Bryan Kizer  
Code 1842  
Southern Division  
Naval Facilities Engineering Command  
Post Office Box 190010  
North Charleston, South Carolina 29419-9010

RE: Remedial Action Plan Addendum  
Alpha Delta Piers  
Naval Station Mayport

Dear Mr. Kizer:

I have discussed the subject document dated August 1994 (received September 8, 1994) with Mr. Bill Neimes of FDEP. He expressed concern during his comments on the original RAP (Comments dated February 28, 1994) regarding soil contamination in the vicinity of the D1-2 oily waste riser and the recommendation by ABB-ES to use an elevated OVA level for the determination of clean soil. His concern was not addressed in the RAP Addendum although it no longer mentions the proposed elevated OVA level as an alternative to current clean soil guidelines. The subject document also does not use consistent nomenclature for monitoring wells.

At a meeting in Tallahassee on April 19, 1994 between representatives of the Navy, FDEP and ABB-ES it was agreed that if pathways to the surface water do not exist or could be stopped via the RAP design, and if worker exposure risk levels are not exceeded, then the soil would probably not require active remediation. Additional investigation was to occur regarding potential risk to workers.

No potential source of contamination should be brought back into service without proper testing or correction of problems. The D1-2 oily riser was reported to be leaky; however, the CAR and subsequent documents indicate it was taken out of service so that the potential source of contamination had been abated. It has come to my attention that the riser is now in service. Please provide the Department with documentation that verifies problems with the riser have been eliminated.

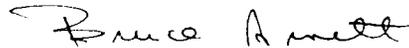
I have enclosed a memorandum from Bill Neimes to Eric Nuzie regarding the subject document. It is not the intent of the Department to slow the proposed rehabilitation of the storm water

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pipes. This should proceed as quickly as possible; however, the other concerns raised by Bill, concerns raised at the April meeting, and those concerning the D1-2 riser should also be addressed. Your prompt attention to these issues will be greatly appreciated

If I can be of any further assistance in this matter, please contact me at (904) 488-3935.

Sincerely,



Bruce Arnett  
Remedial Project Manager

/baa

Enclosure

cc: Cheryl Mitchell, Naval Station Mayport  
Brian Cheary, FDEP Northeast District  
Jerry Young, City of Jacksonville  
John Mitchell, FDEP Natural Resource Trustee

TJB



JJC



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