

N60201.AR.002556  
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT TECHNICAL  
MEMORANDUM BACKGROUND CHARACTERIZATION ACTIVITIES NS MAYPORT FL  
2/14/1994  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## Memorandum

Florida Department of  
Environmental Protection

TO: Eric S. Nuzie, Federal Facilities Coordinator  
Bureau of Waste Cleanup

THROUGH: James J. Crane, P.G. Administrator *JJC*  
Technical Review Section

Jorge R. Caspary, Professional Geologist *JRC*  
Technical Review Section

FROM: David M. Clowes, Remedial Project Manager *DWC*  
Technical Review Section

DATE: February 14, 1994

SUBJECT: Draft Technical Memorandum, Background  
Characterization Activities, RCRA Facility  
Investigation (RFI), NAVSTA Mayport, Mayport,  
Florida.

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I have reviewed the above stated document, dated October 1993, submitted for this site. The following changes need to be addressed before this document can be considered final:

1. On base tours, the area around the "old Mayport library/church" was discussed as the only area on base that was undisturbed by construction or covered by dredge spoil material. It would be useful to sample this area and compare the analytes and levels detected to the other background sample areas as a means to determine if the levels of analytes detected is biased by the dredge material or is the natural background level. The determination of background levels for the areas with and without dredge material influence could affect the feasibility and cost benefit of specific remediation levels/goals of the dredge spoil area (RFA SWMU 50).
2. The conclusion should include a discussion of which target analytes exceeded regulatory standards and criteria for each media (soil, sediment, surface water and groundwater). Additionally, a discussion of the difference of analytes and levels detected in the undisturbed area (except for construction) south of Alpha pier (Figures 1-3a and 1-3b) compared with the rest of the base would be useful in determining spatial variability of analytes.
3. Was arsenic detected in soil samples? The purpose for additional background samples (RFI Group I/Phase I, November 1992) was warranted by the low concentrations and frequency of chemicals in the all media and the need to determine the range for arsenic in groundwater and soil.

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4. The values for Class III-Marine Florida Surface Water Quality Standards (F.A.C. 17-302) listed in the text differ with the current standards. Specifically, the current standard for cyanide is 1 ug/l not 5 ug/l, lead is 5.6 ug/l not 50 ug/l, nickel is 8.3 ug/l not 100 ug/l, selenium is 71 ug/l not 25 ug/l, thallium is 48 ug/l not undefined, and zinc is 86 ug/l not 1,000 ug/l. Therefore, the background screening values (two times the detected arithmetic average) exceeded the FSWQS for copper, cyanide, iron, manganese, nickel, and thallium.