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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT FINAL SITE ASSESSMENT REPORT REVISION I SITE
289 NS MAYPORT FL
5/2/2013
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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RICK SCOTT
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HERSCHEL T. VINYARD JR.
SECRETARY

May 2, 2013

Naval Facilities Engineering Command Southeast
Attn: Mr. Dana Hayworth OPUE3, Remedial Project Manager
135 Ajax Street North, Building 903
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Final Site Assessment Report, Revision 1, Site 289, Naval Station Mayport, Facility ID# 16-8626008, USEPA ID #FL9 170 024 260, Mayport, Florida (Tetra Tech, March 12, 2013)

Dear Mr. Hayworth:

I have reviewed the subject document dated March 12, 2013 which was received on March 14, 2013 and was completed under Contract Task Order JM60. The Purpose and Scope section of the report states *"Tetra Tech, Inc. performed a site assessment (SA) at Site 289, Naval Station (NAVSTA) Mayport, Jacksonville, Florida, for the Naval Facilities Engineering Command Southeast (NAVFAC SE)...The data collected during the investigation were used to prepare a Site Assessment Report (SAR). Information from the field investigation has been assimilated into this SAR to provide a characterization of site conditions from which to base future courses of action."*

The Purpose and Scope section continues by stating *"The purpose of this SA was to determine if subsurface soil and groundwater at Site 289 had been impacted by a former heating oil underground storage tank (UST) and an accidental diesel fuel release that migrated on the asphalt surface to a storm drain and ultimately to the adjacent stormwater ditch. This investigation was initiated because sampling results from previous environmental investigations indicated residual impacts to soil at this site."* In the Purpose of Current Investigation section of the report it states *"The objective of the SA was to assess the extent and magnitude of soil and/or groundwater contamination, if present, at Site 289. The data collected during the investigation was used to prepare this SAR as required by Chapter 62-770.600, Florida Administrative Code (F.A.C.). This SAR provides a characterization of site conditions from which to base future courses of action."*

In the Summary section of the report it states *"In March 2010, approximately 40 gallons of diesel fuel leaked out of the fill port of an abandoned UST at building 289, reportedly caused by*

rain water filling the tank. The release flowed across the asphalt parking lot into a storm drain, and then into the stormwater ditch along the southern site boundary. Approximately 300 gallons of diesel fuel and 200 gallons of an oil/water mixture was pumped out of the tank. The parking lot was scrubbed with absorbent material, and 30 cubic yards of contaminated soil was removed. All waste was disposed of at the on-site facility. Soil samples were collected to determine if the soil near the empty tank was hazardous by characteristic analyses. Subsequently, the area was backfilled with the empty tank in place.” This section continues by stating “In February 2011, the estimated 500-gallon capacity, non-regulated UST was removed, and closure assessment activities were performed... Only soil required to facilitate the tank removal activities were excavated. Sampling results during the closure assessment indicated TRPH impacts to soil in excess of FDEP SCTLs. Groundwater samples showed concentrations less than the applicable FDEP GCTLs.”

The Summary section concludes by stating “*The SA activities performed by Tetra Tech in late 2011 and 2012 included soil gas surveys and multiple soil and groundwater sampling events in the areas of both the former UST and the stormwater ditch. Soil samples collected adjacent to the former UST location (SS-12 and SS-16) showed concentrations exceeding the FDEP SCTLs for TRPH for residential direct exposure scenarios and potential leachability to groundwater. However, groundwater samples collected from MPT-289-MW-02 and MPT-289-MW-03D installed in the same approximate area show no adverse impacts to shallow and deep interval groundwater quality. Soil samples collected in the stormwater ditch trending north to south along the eastern property boundary showed no contaminants of concern exceeding FDEP SCTLs. Groundwater samples collected from all remaining monitoring wells showed no contaminants of concern exceeding FDEP GCTLs.*”

The Recommendations section states “*Based on the results obtained during this investigation, Tetra Tech recommends discussing options with NAVFAC SE to develop a Remedial Action Plan (RAP) to address the impacts to soil exceeding the FDEP SCTLs in the area of the former heating oil UST. The RAP recommendations may include implementing land use controls in this area of the site.*”

Based on the data presented in the document, I am in concurrence with Tetra Tech’s recommendation of discussing RAP options to address site impacts with NAVFAC SE. These discussions should begin at our next NAVSTA Mayport Partnering Team meeting which is to be held on June 4 and 5, 2013. Also, I have the following comment pertaining to the groundwater analytical results.

--Groundwater analytical results for MPT-289-MW03D and MPT-289-PZ02 show PAH exceedances for benzo(a)anthracene, benzo(b)fluoranthene, and indeno(1,2,3,-CD)pyrene. In the Summary section of the report it states “*However, groundwater samples collected from MPT-289-MW-02 and MPT-289-MW-03D installed in the same approximate area show no adverse impacts to shallow and deep interval groundwater quality.*” Please explain the discrepancy between the text stating that there are no groundwater impacts versus the analytical results for

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site groundwater samples. Site 289 groundwater impacts should also be discussed at our next Partnering Team meeting.

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
Federal Program Section

KAW 

cc Tim Bahr, FDEP, Tallahassee