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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT FINAL SITE ASSESSMENT REPORT SITE 5 NAVY
FUEL DEPOT NS MAYPORT FL
6/11/2013
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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SECRETARY

June 11, 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, Site 5 Located at the Navy Fuel Depot -
Jacksonville, Naval Station Mayport, Facility ID# 16-8626008, USEPA ID #FL9 170
024 260, Mayport, Florida (Tetra Tech, April 15, 2013)**

Dear Mr. Hayworth:

I have reviewed the subject document dated April 15, 2013 which was received on April 16, 2013 and was completed under Contract Task Order JM46. In the Introduction section of this report it states *“Tetra Tech, Inc. was awarded a contract by the United States Navy, Naval Facilities Engineering Command to conduct a site assessment for Site 5 at the Fleet Logistics Center (FLC) Jacksonville – Navy Fuel Depot located in Jacksonville, Florida. Tasks included under the contract include the development of a Unified Federal Policy – Sampling and Analysis Plan (UFP-SAP), conducting a field investigation collecting site data, and preparing a Site Assessment Report (SAR) following Chapter 62-780.600, Florida Administrative Code (F.A.C.).”*

In the Purpose And Scope Of The Site Assessment section of the report it states *“The purpose of this site assessment is to characterize the nature and extent of soil and groundwater contamination associated with Site 5 and to evaluate the data to determine if remedial activities are necessary to prevent risk to human health and the environment. A site assessment was requested since historical activities and confirmatory sampling at Site 5 have indicated there are impacts to soil and groundwater.”* It continues by stating *“The scope and Data Quality Objectives (DQOs) for the investigation was presented in the February 2011 Naval Station (NAVSTA) Mayport Installation Restoration Partnering Team (Partnering Team) meeting and were finalized after the Partnering Team reached agreement. The scope included the preparation of a UFP-SAP and SAR.”* It concludes by stating *“The Partnering Team also agreed that the SAR would be prepared following Chapter 62-780, F.A.C., guidelines.”*

In the Conclusion and Recommendation section of the report it states *“This SAR presents information that characterizes the nature and extent of soil and groundwater contamination*

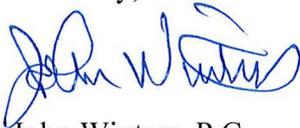
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associated with Site 5 at the FLC Jacksonville – Navy Fuel Depot in Jacksonville, Florida.” This section continues by stating “Site assessment results have revealed that soil is impacted with speciated TRPH (in the EPH fraction) exceeding the residential FDEP SCTL in surface, subsurface, and saturated soils and arsenic contamination was discovered in one location in subsurface soil. The area of impacted soil is estimated to be 108,000 square feet (2.5 acres), and the volume of impacted soils is estimated to be 16,000 cubic yards or 21,600 tons. The estimated area of soil impacted by EPH at three times the residential SCTL is 64,000 square feet (1.5 acres). The volume of impacted soils at three times the SCTL is approximately 9,500 cubic yards or 12,800 tons. (Note: The volume of soil impacted exceeding Industrial SCTLs is estimated to be 3,600 tons.) Assessment results also revealed the presence of groundwater contamination by TPH exceeding the FDEP GCTL at one shallow monitoring well (FLC-5-MW01). The surficial groundwater impacts appear to be localized at the FLC-5-MW01 location and have not migrated beyond the down-gradient site border. Using a depth of 15 feet bls, the area of groundwater estimated to be impacted by TPH is approximately 3,000 square feet (0.2 acre), and the volume of impacted groundwater is approximately 100,000 gallons.” This section concludes by stating “Closure of Site 5 under RMO Level III (NFA with controls with a Risk Assessment) is not recommended since speciated TRPH levels are above Industrial SCTLs and the cost of implementing controls (i.e. LUCs, Engineering Cover) is anticipated to be higher than closure under RMO Level II. Closure of Site 5 following RMO Level II is recommended since the anticipated cost will be significantly lower as compared with closure under RMO Level I or RMO Level III. Details for site closure under RMO Level II will be provided in a Remedial Action Report.”

Based on my review and the data provided in this document, the Department is in concurrence with the conclusions and recommendations presented in this Draft Final Site Assessment Report. Please provide me with the Final version of this document at your earliest convenience.

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 Programs Section



KAW