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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON DRAFT SITE ASSESSMENT REPORT FOR AREA OF CONCERN E
MORAL, WELFARE AND RECREATION DEPARTMENT EQUIPMENT STORAGE AREA NS
MAYPORT FL
5/3/2012
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

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May 3, 2012

Naval Facilities Engineering Command Southeast
Attn: Mr. Brian Syme (OPC6), Remedial Project Manager
135 Ajax Street North, Building 903
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: Draft Site Assessment Report, Area of Concern (AOC) E, Moral, Welfare, and Recreation Department Equipment Storage Area, Naval Station Mayport, Facility ID# 16-8626008, USEPA ID #FL9 170 024 260, Mayport, Florida (Tetra Tech, January 31, 2012)

Dear Mr. Syme:

I have reviewed the subject document dated January 31, 2012 which was received on February 1, 2012 and was completed under Contract Task Order 0088. In the Purpose Site Assessment section of this report it states *"The purpose of this Site Assessment is to characterize the nature and extent of contaminants associated with the AOC E site and interpret this information to determine if remediation activities are necessary based upon the potential risk to human health and the environment."* This section goes on to state *"Previously, the investigation of RCRA sites was being conducted in accordance with the traditional USEPA Resource Conservation and Recovery Act (RCRA) corrective action process of conducting a RCRA Facility Investigation (RFI) and preparing a Corrective Measures Study (CMS). According to Paragraph 7 of Part V of the NAVSTA Mayport's Operating and Corrective Action Permit (Number 72442-HO-004) issued August 17, 2009, the Permittee (Navy) is required to commence site rehabilitation in accordance with Rule 62-730.225 and Chapter 62-780, F.A.C., in which...This transition from the RCRA corrective action process to processes allowed by Chapter 62-780, F.A.C. (Global Risk-based Corrective Action) was discussed at subsequent Partnering Team meetings...During the August 2011 Partnering Team meeting the Partnering Team reached consensus that the corrective action process would transition from the traditional USEPA process to the process under Chapter 62-780, F.A.C. At this meeting, Tetra Tech was authorized to prepare a SAR."*

In the AOC E Site Assessment Conclusions and Recommendations section it states *"AOC E is a relatively small area (0.63 acres in total area) that is characterized as having light commercial and/or light industrial land use patterns. The Navy Morale, Welfare, and Recreation Department use the structures on AOC E to maintain and store golf course maintenance equipment and golf course maintenance supplies. Based upon past site usage, a limited assessment associated with the removal of two USTs and a visual site inspection, it was determined that full site assessment was necessary at the site."* This section goes on to state *"The Confirmation Sampling (CS) report detailing the confirmatory sampling results were submitted in 2007. The results were used to refine the target analyte list to TRPH and arsenic and focus additional soil and groundwater sampling locations. A RFI/CMS Work Plan was submitted in July 2009 and recommended additional soil and groundwater sampling based on the CS results. After the January 2010 Partnering Team meeting, an email was sent to the Partnering Team detailing the final details of the work plan for this SAR."* The section continues by stating *"Two sampling events were conducted during the period addressed by the site assessment. After the results from Event 1 were reviewed, the Partnering Team decided to install an additional groundwater monitoring well to define the horizontal extent of contamination. The monitoring well was installed, and a single groundwater sample was collected during Event 2."*

Results of the site assessment were discussed next in this section. The section states *"Results showed TRPH exceeded its residential SCTL at MPT-AOCE-SS06 at 0.5 foot bls; however, the results from the same sample for the speciated TRPH components did not exceed respective SCTLs. No other soil sample TRPH result from Event 1 exceeded the TRPH SCTL. Groundwater samples showed one exceedance of arsenic at MPT-AOCE-MW07. However, NAVSTA Mayport personnel report that arsenic or pesticides containing arsenic were not stored in this area. After combining the previous groundwater sampling events from the CSR, the area of arsenic-contaminated groundwater was determined to be approximately 0.04 acre in the southeastern portion of AOC E. A task order is currently funded for a background study of the naturally-occurring levels of arsenic in groundwater at NAVSTA Mayport. Once the results from the background study are analyzed, the current levels of arsenic in monitoring well MPT-AOCE-MW07 should be compared to the background study. It is anticipated that the levels of arsenic in monitoring well MPT-AOCE-MW07 may be representative of the naturally occurring levels of arsenic at the base."* The final conclusion statement is *"In 2007, one soil sample (SS08-0.5) showed an exceedance of the SCTL for leachability to groundwater for chromium. Chromium was detected at levels well below the Groundwater Cleanup Target Level (GCTL) in all of the groundwater samples collected during confirmatory sampling events. Additionally, per "operator knowledge," there is no known source of chromium for this site. Therefore, the leachability exceedance of chromium detected in surface soil at MPT-AOCE-SS08 was not further addressed in subsequent sampling events."*

In this section, the recommendations for AOC E are stated as *"The AOC E site assessment findings of geology, hydrogeology, and nature and extent of contamination support the conclusion that the soils are not contaminated, and there is a small area (approximately 0.04 acre) of arsenic-contaminated groundwater associated with AOC E. The data collected support a proposal for No Further Action using Risk management Option (RMO) Level II, Option II D. The proposal would be submitted as detailed in Chapter 62-780, F.A.C. and RMO Level II is appropriate since there is no contamination (as defined by the FDEP) in soils and the area of groundwater contamination is less than 0.25 acre."* An additional recommendation is stated as *"Tetra Tech recommends conducting three additional quarters of monitoring to verify that the site meets the RMO Level II D Option."*

I am in concurrence with the stated conclusions presented in this report. I have the following comment pertaining to the recommendations.

1. If arsenic in groundwater is our only contaminant of concern left at AOC E, and a groundwater background study is going to be conducted at the facility in the near future for arsenic and other metals, then wouldn't it be prudent to wait for these results to see if the site meets the Department's No Further Action criteria instead of proceeding with the recommendations that have been presented in this report?

Please respond to this comment and then send me the Final version of this Site Assessment Report. 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



ESN 

cc Tim Bahr, FDEP, Tallahassee