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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
REGULATION REGARDING FINAL DRAFT RESOURCE CONSERVATION AND RECOVERY  
ACT FACILITY INVESTIGATION WORK PLAN NS MAYPORT FL  
5/9/1990  
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION



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## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

May 9, 1990

Mr. Jim Reed  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
Code 11514  
P.O. Box 10068  
Charleston, South Carolina 29411-0068

Dear Mr. Reed:

Department personnel have completed the technical review of the Final Draft RFI Work Plan, RCRA Facility Investigation, December 1989, U.S. Naval Station, Mayport, Florida. I enclosed two memoranda addressed to me that document the Department's concerns. None of the comments appear to be contradictory.

If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,

Eric S. Nuzie  
Federal Facilities Coordinator  
Bureau of Waste Cleanup

ESN/mlr

Enclosure

cc: Satish Kastury  
Ashwin Patel



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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# Interoffice Memorandum

Bureau of Waste Control

FEB 21 1990

Technical Review Section

NORTHEAST DISTRICT - JACKSONVILLE

TO: Eric Nuzie

THROUGH: Ashwin B. Patel *ABP*

FROM: Indar Jagnarine *IJ*

DATE: February 19, 1990

SUBJECT: U.S. Naval Station - Mayport  
Duval County - Hazardous Waste  
Final Draft of U.S. Naval Station - Mayport's  
RCRA Facility Investigation (RFI)  
RFI Work Plan (Vol. I and II)

I have reviewed the above-subject document dated December 1989, and received January 26, 1990. Based on this review, the following are my comments.

The Sampling and Analysis (SA) Plan should include provisions for detecting immiscible contaminants (i.e. floaters and sinkers). The SA Plan should specify the device to be used to detect light and dense phases as well as the procedures to be used for detecting and sampling these contaminants.

In cases where immiscible contamination is found during characterization, water level measurements should be adjusted to reflect the true elevation.

It is recommended that air in the well head be monitored for organic vapors in order to determine potential for fire, explosion, and/or toxic effects on workers.

The facility should include a plan for borehole(s) abandonment in the event that any borehole/well does not serve its intended use.

IJ:jf



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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# Interoffice Memorandum

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

FROM: *JJC* Dr. James J. Crane, Administrator, Technical Review Section, Bureau of Waste Cleanup

DATE: March 22, 1990

SUBJECT: Final Draft RFI Work Plan, RCRA Facility Investigation, December 1989, U.S. Naval Station, Mayport, Florida

I've reviewed the following documents:

- (1) Work Plan, including Data Management Plan and Project Management Plan
- (2) Sampling and Analysis Plan, including Site Management Plan, Field Sampling Plan and Appendices A-C
- (3) Health and Safety Plan

I've arranged my comments to follow the above order.

- (1) The Work Plan appears to be satisfactory for its purpose, with the exception of several issues that will be commented upon in the review of the sampling and Analysis Plan
- (2) Sampling and Analysis Plan  
Section 3.3.2 (Site 1-Landfill A) - If MPT-1-2 and MPT-1-3 were not sampled within the last year, a more extensive parameter list such as that proposed for MPT-1 should be run, particularly the volatile organics. Some landfill leachates tend to pulse and vary with time.

Section 3.3.3 (Sites 2,4,5&6) - EPA Method 8015 (non-halogenated volatiles) should also be run on all samples. Semivolatile organics, particularly PAHs, should be analyzed for with an approved EPA Method.

Table 3-15 - Note that ICAP detection limits for several metals are higher than groundwater or surface water standards, e.g., arsenic, lead. Also, the detection limits may be too high to provide adequate data for risk assessment and environmental assessment purposes.

Appendix A - QAPP - Please note that "compliance with groundwater standards shall be determined by analyses of unfiltered groundwater samples, unless a filtered sample is as or more representative of the particular groundwater quality" (Chapter 17-3.401(6), F.A.C.

- (3) Health and Safety Plan - No comments.

JJC/rv