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NS MAYPORT
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LETTER REGARDING FLORIDA GROUNDWATER GUIDANCE CONCENTRATIONS NS
MAYPORT FL
12/9/1994
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

212

Naval Station Mayport
Administrative Record
09.01.00.0092

Virginia B. Wetherell
Secretary

December 9, 1994

Mr. David Driggers, Code 1852
SOUTHNAVFACENGCOM
2155 Eagle Dr., P.O. Box 190010
North Charleston, SC 29419-9010

RE: Rules 62-520, 62-550, and Florida Ground Water Guidance Concentrations, Naval Station Mayport.

Dear Mr. Driggers:

As we discussed at the meeting in Charleston beginning on November 30, 1994, the Navy is revising its RFI Workplan for NS Mayport and has requested information from the Department concerning the State's guidance concentrations for ground water. The Navy wants this information to refine their analytical program and to specify appropriate detection limits for analysis of ground water samples. The Navy is required to comply with the HSWA permit for NS Mayport and are using either SW-846 or CLP analytical methodologies, as approved by the EPA Region IV Administrator.

The Navy also wishes to comply with State policies. The State's ground water guidance concentrations may be lower than the PQLs achievable by the HSWA-specified techniques, particularly for some volatile organic compounds. In addition, there may be compounds that have ground water guidance concentrations that are not on the Navy's present target analyte list at Mayport. This letter summarizes for the Navy the regulatory background for the State's ground water guidance concentrations and provides a recommendation to the Navy for incorporating them into their decision processes at Mayport in a cost effective manner while maintaining protectiveness.

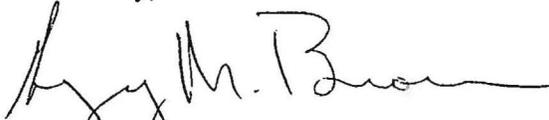
The Florida Primary, Secondary and minimum criteria, or "free from" Water Quality Standards, are promulgated rules (Chapters 62-520 and 62-550, Florida Administrative Code). The updated 1994 Florida Ground Water Guidance Concentrations booklet contains the Maximum Concentration Levels (MCLs) and numerical interpretations by Department toxicologists of the promulgated narrative minimum criteria standard. The Primary and Secondary Drinking Water Standards are established in Chapter 62-550, F.A.C. and promulgated as ground water standards in Chapter 62-520, F.A.C. For those constituents in the booklet that do not have Primary or

Secondary Drinking Water Standards, the Department considers them site-specific minimum criteria for assessment purposes. Furthermore, the Department considers them cleanup levels unless alternative ones are approved by the Department.

The Navy should review the 1994 Florida Ground Water Guidance Concentrations booklet with their laboratory chemists and identify constituents with guidance concentrations that are not presently considered target analytes or that have PQLs above the guidance concentrations using the HSWA-specified analytical techniques. They should then identify approved alternative analytical techniques that can obtain the listed PQLs that are at or below the guidance concentrations. (Note that there are guidance concentrations for a small subset of constituents that are below listed PQLs. In these cases, the listed PQL is the operable guidance concentration.)

The Navy should review their sampling plan and identify key monitoring locations. These locations may be points of potential receptor exposure to ground water, fringes of suspected ground water contaminant plumes, and background locations. The Navy should sample these monitoring locations and analyze the samples with the approved alternative analytical techniques that achieves the PQLs listed in the guidance booklet. Depending on the specific constituents and alternative analytical techniques chosen, data quality objectives may be achieved and the analyses may be acceptable to the EPA for the HSWA permit requirements as well. Future action would be based on analysis of the sampling results. This approach would: (1) be consistent with the Department's ground water guidance and the HSWA permit; (2) maintain protectiveness of the public health and environment; and (3) minimize the economic consequences to the Navy of any additional sampling and analysis. If you have any questions, please call me at (904) 488-3935.

Sincerely,



Gregory M. Brown, P.E.
Professional Engineer II
Technical Review Section

GMB/gmb

cc: Cheryl Mitchell, NS Mayport
Jay Bassett, USEPA Region IV
Peggy Layne, ABB-ES

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