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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING DRAFT BASEWIDE
WORK PLAN NS MAYPORT FL
6/27/2000
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 27, 2000

4WD-FFB

Ms. Adrienne Wilson
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
Charleston, S.C. 29419-9010

SUBJECT: NAVSTA Mayport, Florida
EPA ID# FL9 170 024 260

Dear Ms. Wilson:

The U.S. Environmental Protection Agency (EPA) has reviewed the following document:

- **Draft Basewide Work Plan, Naval Station Mayport, Mayport, Florida, Revision 00** (CH2M Hill, May 1999).

Enclosed are EPA's review comments. If you have any questions, please contact me at 404.562.8555.

Sincerely,

A handwritten signature in black ink that reads "Craig A. Benedikt".

Craig A. Benedikt
Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: James Cason, FDEP
Randy Bishop, NAVSTA Mayport

**EPA Review Comments
Draft Basewide Work Plan
Naval Station Mayport
Dated May 1999**

1. **Page IV, Acronym List.** In general, too many acronyms are utilized in this document which affects the overall readability of the work plan. The acronym "COC" is used twice in the list; however, "COC" should only have one definition in the work plan. The acronym "GFCI" should be defined as "ground fault circuit interrupt". "GIS" should be defined as "geographic information system". The abbreviation for milliliter should be "ml" not "ms". "MTBE" should be defined as "methyl tertiary butyl ether".
2. **Page 2-1, Purpose and Scope.** The third paragraph on this page should state that all sampling and analysis will be conducted pursuant to the EPA Region 4, Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM), May 1996.
3. **Page 2-3, Section 2.2.1.2.** Since this is a base-wide work plan, the possibility of encountering chlorinated solvents and their by-products in groundwater should be addressed in this section. In addition, labeling of the samples should be addressed in the steps related to collection of water samples for volatile organic analyses at the bottom of the page.
4. **Page 2-4, top of page.** Labeling of samples should be address in the steps related to collection of water samples for non-volatile organic or inorganic analyses.
5. **Page 2-5, Section 2.2.3.** All sample equipment decontamination should be conducted pursuant to the EPA Region 4, EISOPQAM, dated May 1996.
6. **Page 3-1, Section 3.1, Wastestreams.** Waste should be handled and disposed of in accordance with appropriate Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments (HSWA) guidelines as well as those established by FDEP. In addition, Section 3.0 of the work plan should contain a subsection addressing decontamination procedures for containers and equipment along with the appropriate references pursuant to the EPA Region 4, EISOPQAM, dated May 1996.
7. **Page 4-3, Section 4.8.** Spills involving containers possibly containing waste material should also be addressed in this section.