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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING CORRECTIVE
MEASURES STUDY FOR SOLID WASTE MANAGEMENT UNITS 12 AND 17 NS MAYPORT
FL
4/16/2002
U S EPA REGION IV



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

April 16, 2002

4WD-FFB

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

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

Dear Ms. Wilson:

The United States Environmental Protection Agency (EPA) has received and reviewed the following document:

- **Corrective Measures Study for Solid Waste Management Unit Numbers 12 and 17, Naval Station Mayport, Mayport, Florida, Rev. 0 (Tetra Tech NUS, Inc., March 2001)**

Enclosed are EPA's review comments. If you should 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
Senior Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: Jim Cason, FDEP
Cheryl Mitchell, NAVSTA Mayport

**EPA Comments on
Corrective Measures Study
Solid Waste Management Unit Numbers 12 and 17
Naval Station Mayport
March 2001**

General Comments

1. In the executive summary and in the body of the CMS, references are made to the volume and square footage of contaminated soil and groundwater. Two values are usually given, one for organic contaminants and one for inorganic contaminants, without any mention of whether the smaller volume or area is within the larger volume or area. It is necessary to refer to the drawings in Appendix C to determine that:
 - for SWMU 12, the smaller area of organic contamination in groundwater is within the larger area of inorganic contamination,
 - for SWMU 17, there are two separate areas of soil contamination which consist of both organic contamination and inorganic contamination in each, and
 - for SWMU 17, the smaller area of inorganic contamination in groundwater is within the larger area of inorganic contamination.

Explaining in the text the information given in the above bulleted items should eliminate these points of confusion.

Specific Comments

1. **Page 1-2, Figure 1-1.** The boundary of Naval Station Mayport should be highlighted on this figure.
2. **Page 1-7, First Bulleted Item.** In discussing the relationship between tidal fluctuation and groundwater levels, this item states that a time lag of approximately 7.5 to 11 hours exists. Page 2-10 states that the time lag is 4 to 6 hours. This inconsistency should be eliminated.
3. **Page 2-8, Fourth Paragraph.** This paragraph states that detected concentrations were compared with RFI background concentrations for both inorganics and organics. There are no "background" values for organics. This should be clarified.

4. **Page 2-9, Last Partial Paragraph**. This discussion is confusing. For example, the first sentence lists the inorganic constituents which were detected in the surface soil samples. This list includes cobalt, mercury and nickel. The second sentence states that none of the analytes were detected at concentrations greater than their background screening values. The next sentence states that cobalt and mercury were detected in site samples but not in the background samples. If this were the case, cobalt and mercury would have to be at concentrations greater than background values. That sentence also states that nickel was detected only in the background samples. This is in contrast to the first sentence which states that nickel was detected in the soil samples. These points of confusion should be eliminated.
5. **Page 2-67, Last Sentence**. This sentence references the implementation of selected corrective measures. This should be changed to the recommended corrective measures.
6. **Page 3-5, Second Paragraph**. In the second sentence of this paragraph, “None of the organic compounds. . . .” should be changed to “None of the inorganic analytes. . . .”
7. **Page 3-73, Last Sentence**. This sentence references the implementation of selected corrective measures. This should be changed to the recommended corrective measures.