

N60201.AR.000690
NS MAYPORT
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION FOR AREA OF CONCERN C NS MAYPORT FL
12/30/2003
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

December 30, 2003

Ms. Adrienne Wilson
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, SC 29419-9010

file: AOC_C_rfi2.doc

RE: RCRA Facility Investigation for Area of Concern C, Naval Station Mayport, Mayport,
Florida

Dear Ms. Wilson:

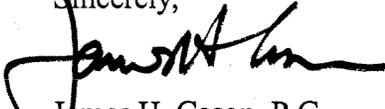
I have reviewed the above document dated August 2003 (received September 20, 2003). The document concludes that additional soil delineation should be accomplished for certain PAH constituents and further recommends that a supplemental letter report be incorporated as an appendix to the present document and that a CMS be developed which addresses contaminated groundwater at the site. I concur with that recommendation. Additionally, please adequately address the following:

1. Please furnish a proper professional certification page for the document.
2. Please provide a summary table for all analytes that exceeded residential scenario SCTLs. Please furnish a figure depicting the locations and analytical value of those exceedances; (how do we know where the "less than Residential" scenario begins?). This, and the subsequent questions, may be accomplished as a supplemental Technical Memorandum in place of reissuing the document.
3. Please clarify the discussion in the Executive Summary regarding cyanide. Why is the analytical value for cyanide in your sample(s) different from what the SWCTL is?
4. Section 5.3.1.1.3 discusses PCB concentrations in one sample above the Residential Scenario SCTL, yet that value does not appear in Table 5-1 or in the Conclusions and Recommendations. Please justify this.
5. In the Conclusions and Recommendations section, there is a discussion of reporting limits, "less than" values, and other possible reasons for analytical values being in excess of the regulatory values; however, the discussion is "open-ended" and no conclusions are made or postulated. Please try and do this.

Ms. Adrienne Wilson
Page Two
December 30, 2003

We can discuss these issues at the next Partnering meeting if you want, or if you need further clarification or any additional information, please feel free to contact me at 850-245-8999.

Sincerely,



James H. Cason, P.G.
Remedial Project Manager

CC: Craig Benedikt, EPA Region IV, Atlanta
Terry Hansen, Tetra Tech, Tallahassee

JJC ESN ESN ESN