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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE FINAL FEASIBILITY STUDY FOR SITE 13 NAS WHITING FIELD FL
7/2/2002
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



JEB BUSH
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

July 2, 2002

Ms. Linda Martin
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, South Carolina 29419-9010

file: 13fs2.doc

RE: Final Feasibility Study, Site 13, Sanitary Landfill, Naval Air Station Whiting Field,
Milton, Florida

Dear Ms. Martin:

I have reviewed the subject document dated March 2001 (received April 6, 2001). My prior comments have been addressed; however, the Navy should address the following comments:

1. Table 2-1, page 2-5: References to Chapter 62-736, FAC should be deleted since that chapter has been incorporated into Chapter 62-730, FAC. Chapter 62-777, FAC should be denoted as "To Be Considered." Please add *Guidance for Disturbance and Use of Old Closed Landfills or Waste Disposal Areas in Florida (May 3, 2001)*. This document is "To Be Considered" and is "Guidance."
2. The document discusses arsenic as a primary driver for regulatory action. Since this document was produced, arsenic has been judged to be present in naturally occurring concentrations at NASWF. The Navy should consider rewriting the document based on this important change. This leaves vanadium in soil as the primary risk driver. If the Navy chooses to continue the present course, preparing a Proposed Plan, it will have to include non-residential land use controls based on vanadium in soil as a portion of the remedy. If the Proposed Plan is not completed prior to the adoption of anticipated changes in the SCTLs in Chapter 62-777, F.A.C. (as early as next year), this aspect may be eliminated as a regulatory driver in the Proposed Plan.
3. Page 2-10, second "bullet:" The MOA is actually not a legally binding document.
4. Section 2.3, Volume of Contaminated Media: this section is actually not appropriate since it was prepared for the purpose of "hot spot" removal of arsenic.
5. Section 4.1.12, Technical Criteria Assessment Alternative 1: in the discussions regarding compliance with ARARs, long term effectiveness and reduction in toxicity, the

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alternative will not comply because of vanadium and other inorganic contaminants in the soil. This applies to other sections of the document (such as the assessment for Alternative 2) where a similar line of thought prevails and is discussed.

6. On page 4-5 (and other sections), the discussion of the MOA and the LUCAP reads like they are separate documents and the LUCAP will be created in the future. The existing MOA is the LUCAP and this should be clearly stated.

As I have previously stated, this document requires considerable rewriting. I suggest that the Partnering Team would be helpful during that process. Thank you for the opportunity to review this document. If you have any questions or need further clarification, please contact me at (850) 921-4230.

Sincerely,

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

cc: Craig Benedikt, USEPA Atlanta
Jim Holland, NAS Whiting Field

TJB _____ JJC _____ ESN _____