

N60508.AR.000059
NAS WHITING FIELD
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE FINAL FEASIBILITY STUDY FOR SITE 17 NAS WHITING FIELD FL
1/3/2003
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

January 3, 2003

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

file: 17fs2.doc

RE: Final Feasibility Study for Site 17, Crash Crew Training Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the above document dated March 2001 (received April 6, 2001). The document appears to be well prepared; however, please address or clarify the following concerns before the document can be considered as final:

1. The document notes and discusses the presence of cadmium in soil with respect to an ecological receptor concern at sampling point 17-SL-29. This point is apparently outside the soil cover (Figure 1-3) that was placed at Site 17 during the IRA. In the RI Summary, Section 1.5, page 1-9 it states: "Only sublethal risks associated with ingestion of cadmium...are predicted for small mammals and birds at Site 17. However, this exposure route was eliminated by the construction of the soil cover." This statement is in contrast to a later statement, in Section 2.2, Identification of RAOs (page 2-8), where it states: "...risks to small birds would be significantly reduced if covering or removing contamination at sample location 17-SL-29 occurs." On the same page it concludes: "...impacts to small mammals following remediation of 17-SL-29 are considered unlikely." Based on those conclusions, a combination of the proposed alternatives, including excavation or additional soil covering will be necessary, not simply a single alternative such as Land Use Controls. Please be aware that an early draft Proposed Plan dated May 2000 recommended only Land Use Controls for Site 17.
2. One of the aspects of the contaminants at Site 17 was that TRPH was found in concentrations exceeding leachability levels. Additionally, the cover that was placed during the IRA was permeable (page 1-7, Section 1.4, Interim Actions). Please confirm that this aspect of the contamination at Site 17 will be properly addressed.
3. One of the confusing aspects of this site has been assurance that the soil cover was placed on all points of contamination other than sample point 17-SL-29. For the administrative record, please document that this was in fact accomplished.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Ms. Linda Martin
Page Two
January 3, 2003

Thank you for the opportunity to review this document. If you have questions or need further clarification, please contact me at (850) 245-8999.

Sincerely,

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

cc: Craig Benedikt, USEPA, Atlanta
Jim Holland, NASWF
Terry Hansen, Tetra Tech NUS, Tallahassee

TJB_____JJC_____ESN_____