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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 18 NAS WHITING FIELD FL  
1/27/2003  
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 27, 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: 18fs2.doc

RE: Final Feasibility Study for Site 18, Crash Crew Training Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the above document dated March 2001 (received March 27, 2001). The following comments should be adequately addressed before the document can be considered final:

1. According to my records, the Site 18 RI has not been finalized. My last official correspondence for this site was dated September 7, 2000. I sent an e-mail noting this apparent discrepancy on April 23, 2002. This needs to be reconciled.
2. The RI noted benzo-a-pyrene in surface soil exceeding industrial SCTLs. In referring to the RI, Tables 5-7 and 5-8, in the absence of a figure denoting such contaminants and their location, I cannot correlate the exceedance(s) with sample locations; hence, I cannot determine if the IRA adequately addressed this problem or if the Navy plans to address it at all. Please adequately correct this discrepancy.
3. Page 3-4, Section 3.2.2 discusses land use controls as if they existed outside the current Memorandum of Agreement (MOA), in fact, it appears that the discussion was formulated in order to exclude mention of the MOA. This is also noted in Section 4.2.1. and was previously commented on as my comment 7 in Appendix E. Is the Navy excluding such discussion for a purpose? If not, it should be discussed and properly considered with respect to any future land use controls.
4. Page 4-6: plastic sheeting is measured in "mils." These are thousands of a millimeter. The reference to "6 millimeter" plastic sheeting should properly be 6 mil. This is not a big problem, but it detracts from the quality of the document.
5. In the detailed technical description of Alternative 3 (page 4-6), it appears that the Navy is considering removal of the two foot soil cover and the (now covered) two feet of native soil, then placing a two feet of soil cover on the site. Please be aware that according to

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Ms. Linda Martin

Page Two

January 27, 2003

the RI (page 5-36, Section 5-4), there is subsurface soil that exceeds residential and industrial SCTLs for TRPH. In this case, land use controls will still be required for this site and should be included as part of Alternative 3.

We may be able to address some of these concerns at the upcoming Partnering meeting next month. In the meantime, 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

TJB \_\_\_\_\_ JJC \_\_\_\_\_ ESN \_\_\_\_\_