

N60508.AR.000083
NAS WHITING FIELD
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SITE 6 FEASIBILITY STUDY ADDENDUM, RECORD OF DECISION AND
PROPOSED PLAN NAS WHITING FIELD FL

6/16/2004

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

June 16, 2004

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: 6FSadd_PP_ROD1.doc

RE: Draft Feasibility Study Addendum, for Site 6, South Transformer Oil Disposal Area, Surface and Subsurface Soil, Revision 1, NAS Whiting Field

Draft Proposed Plan for Site 6, South Transformer Oil Disposal Area, Surface and Subsurface Soil, May 2004, NAS Whiting Field

Draft Record of Decision for Site 6, South Transformer Oil Disposal Area, Surface and Subsurface Soil, Revision 0, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the above draft documents dated, respectively, May 25, 2004 (received June 1, 2004), May 2004 (received April 26, 2004) and June 15, 2004 (received May 5, 2004). Mr. Jeff Lockwood, P.E., has also reviewed the FSA. His comments are attached. I have chosen to collectively review these documents because of their inter-related nature and the fact that they should be accurate in their content. Please adequately address the following comments in the final documents:

1. The FSA, Proposed Plan (PP) and Record of Decision (ROD) all discuss arsenic and other metals (iron, aluminum, manganese and vanadium) as being "naturally occurring." For arsenic, this was done formally by me as correctly noted in the FSA. The other metal constituents have been individually evaluated by me based on a "weight of evidence" approach, considering the soil makeup and background information prepared as a result of my comments on the Site 40 RI. This reference, titled "*Inorganics in Soil at NAS Whiting Field*," is included as an Appendix to that document. An integral part of my evaluation and decision for individual sites at NAS Whiting Field was our prior discussions regarding those individual metal constituents regarding the fact that there was no direct evidence of their use at the site(s). Accordingly, I request that the documentation included in the Site 40 RI that was utilized in my determination be properly referenced in the FSA. Subsequent references may quote the FSA. Additionally, the Navy should state in the FSA (and subsequent documents; the PP and the ROD) that those constituents (iron, aluminum, manganese and vanadium) have no evidence of site-related use as we have previously discussed. This way, my concurrence

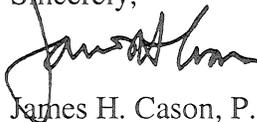
with the FSA, and any subsequent documents, formalizes my agreement with those conditions and shows that it was not an arbitrary decision on my part, but was based on information furnished by the Navy.

2. All future documentation for other sites should emphasize the non site-related nature of the constituents, if this is the case; this is an important consideration in the decision process.
3. Chromium: there are some evident disconnects in the treatment and discussion of this constituent. In the FSA, the highest occurrence (Table 2-1) is 65 mg/Kg, below the Florida SCTL (Residential Scenario) of 210 mg/Kg, yet the PP (page 2) and ROD (page 1-1; 2-1, 2-8, Section 2.5.1.2, Table 2-1 and others) discuss the levels of chromium as being "above the Residential Scenario SCTL." No mention of chromium is made in any of the discussions concerning soil excavation. What happened? The Navy should clearly state the situation with respect to chromium; if it exceeds SCTL, address it; if it doesn't, correct the many misstatements. For your information, I have found that a document search for the word "chromium" in the individual documents makes this process easier.
4. ROD, Section 2.5.1.1: this paragraph says very little that is applicable to the ROD. I suggest it be made applicable or delete it.
5. ROD, Section 2.5.1.2: the second paragraph discusses the evaluation of the total soil profile. The same is indicated in the next section, 2.5.1.3. There is evidently little, or no, soil contamination at this site and pending guidance (attached) from the Department does not allow this method of evaluation. Future determinations of this nature will not be allowed. Is it really necessary for Site 6?
6. PP, page 2: in the second column, the water table is said to be 80-90 feet below land surface. Two sentences later ("bullet" #1), it discusses trichlorethene in a soil sample from 117-119 feet below land surface. Where is the water table? Since the trichlorethene was from 117 feet below land surface and was below the Residential Scenario SCTL, why discuss it at all? In "bullet" #2, it says that chromium (among other constituents) exceeded Residential Scenario SCTLs. As noted previously, data (Table 2-1) presented in the FSA (or the ROD) do not corroborate this statement. Where does this statement find basis in fact?
7. PP, page 3, Human Health Risks: the HI, calculated using the additivity method, for a hypothetical child resident is given as 1.1. On the previous page, it is clearly stated that an HI greater than 1 suggests adverse risk. Please justify why this guidance was apparently ignored by simply making the statement that "the HIs for individual target organs do not exceed 1.0." Please also relate your answer to the statement in the FSA, page 3-1, where it states that "No carcinogenic or non-carcinogenic human health risks have been identified."

8. ROD, Section 2.6, Summary of Site Risks: since very little in the area of actual decisions were based on calculated risks, it seems that this section is rather lengthy and could be improved by including only significant information. Most of this information may be more appropriate within the context of the FSA. It would certainly make the ROD more understandable and appropriate.
9. ROD, Section 2.6.1.6, Uncertainty Analysis: the statement is made that "Statistical EPC values are presented in the FS Addendum." Where is this presentation? It also states that "Risks using the 95 percent UCL were recalculated for information purposes, and are presented in the FS Addendum." Where is this presentation? Please furnish the dataset used and discuss/describe the methods utilized. Maybe I overlooked it, but I found no reference(s) to those calculations in the FSA. Please be aware that Florida is developing guidance regarding methods of calculating such values (appended) and future calculations of this nature must be furnished for review.

My intent in evaluating the three documents collectively was to insure that information in the administrative record is factual, correlates properly and is presented clearly. I hope that your responses to these comments will help accomplish that. I anticipate that once these comments are adequately addressed, I will support the actions discussed in the ROD. If you need additional information or further clarification, please feel free to call me at 850-245-8999.

Sincerely,



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

CC: Craig Benedikt, US EPA Region IV, Atlanta
Ron Joyner, NAS Whiting Field
Terry Hansen, TetraTech, Tallahassee

ESN  JJC 

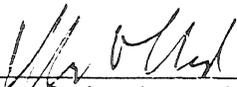
June 14, 2004

CERTIFICATION OF APPROVAL

RE: Feasibility Study Addendum for Site 3, Underground Waste Solvent Storage Area – Surface and Subsurface Soil
Feasibility Study Addendum for Site 6, South Transformer Oil Disposal Area – Surface and Subsurface Soil
Naval Air Station Whiting Field, Milton, Florida

In my professional judgment, the engineering features described in the documents Feasibility Study Addendum for Site 3, Underground Waste Solvent Storage Area – Surface and Subsurface Soil and Feasibility Study Addendum for Site 6, South Transformer Oil Disposal Area – Surface and Subsurface Soil, both dated May 2004 (received June 1, 2004), provide reasonable assurance of reducing applicable pollutants that may be potentially harmful or injurious to human health or welfare and animal or plant life in accordance with state requirements described in Chapter 376, F.S. Ms. Lisa Campbell, Florida P.E. License No. 43887, is the engineer of record for these documents.

I have not evaluated and do not certify aspects of this plan that are outside the limits of my review responsibilities and outside of my area of expertise, including but not limited to electrical, mechanical, and structural features.



Jeffrey D. Lockwood, P.E.
Professional Engineer No. 39554
Expires February 28, 2005

6-14-04

Date