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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON SITE 3 FEASIBILITY STUDY ADDENDUM, RECORD OF DECISION AND PROPOSED PLAN NAS WHITING FIELD FL

6/16/2004

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

Jeb Bush
Governor

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: 3FSadd_PP_ROD1.doc

RE: Draft Feasibility Study Addendum for Site 3 Underground Waste Solvent Storage Area, Surface and Subsurface Soil, Revision 1, NAS Whiting Field

Draft Proposed Plan for Site 3 Underground Waste Solvent Storage Area, Surface and Subsurface Soil, May 2004, NAS Whiting Field

Draft Record of Decision for Site 3 Underground Waste Solvent Storage Area, Surface and Subsurface Soil, Revision 0, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the above draft documents dated, respectively, May 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 Feasibility Study Addendum (FSA). His comments are attached. Please note that 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, I suggest that the Navy should state in the FSA within "bullet 3 of the Introduction that those constituents (iron, aluminum 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 concurrence 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. I suggest minor rewording of "bullet" 3 of the FSA by deleting "were determined to represent…" and substituting "suggests that they are present at..."

3. All future documentation for other sites should document the non site-related nature of the constituents, if applicable, as this is an important consideration in the decision process.

4. Proposed Plan, page 2, 2nd column: date of the FSA should be 2004.

5. Chromium is not mentioned in the FSA, but is discussed in the PP as a consideration. Should it be discussed in the FSA?

6. ROD, page 2-3, 2-5 and 2-6: FSA should be dated 2004, should it not?

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 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 ESN JJC JJC

Memorandum

Florida Department of
Environmental Protection

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