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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON SITE 35 FEASIBILITY STUDY NAS WHITING FIELD FL
7/26/2006
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

From: Benedikt.Craig@epamail.epa.gov
To: Mike.Jaynes@ttnus.com; sarah.reed@navy.mil; smithl@ttnus.com
Subject: Fw: Site 35 FS
Date: Thursday, August 03, 2006 4:15:35 PM
Attachments: 35FS0707.doc

Here's Jim Cason's Site 35 FS comment letter.

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch
U.S EPA Region 4
(404) 562-8555
(404) 562-8518 FAX
Benedikt.Craig@epa.gov

----- Forwarded by Craig Benedikt/R4/USEPA/US on 08/03/2006 04:07 PM -----

"Cason, James" <James.Cason@dep.state.fl.us> To Craig Benedikt/R4/USEPA/US@EPA
07/26/2006 04:22 PM cc
Subject
Site 35 FS

Craig:

I have sent the attached letter up for co-signatures. We don't have any real
problems with it; just a few clarifying statements.

<<35FS0707.doc>>

Jim Cason

James H. Cason, P.G.
Florida Department of Environmental Protection
2600 Blair Stone Road
Twin Towers Building, MS 4535

Tallahassee, FL 32399-2400

Telephone: 850-245-8999

The four Golden Rules for site assessment/remediation:

For soil, delineate completely and dig to "clean," or dig out what you will and take confirmatory samples to prove you dug to "clean."

Delineate all contamination in all media vertically and horizontally.

For LUC sites, if for the Industrial scenario, delineate to Residential (not necessarily the site boundary originally designated).

Now, after all this, don't forget leachability.

On Geochemical Protocols:

"Alternative approaches in which data are pooled and then attempts are made to sort specific samples into either 'background' or 'affected' categories have serious problems and should be avoided."

"It is important that site soil and background soil samples be matched as closely as possible with respect to the geochemistry of trace metals being considered."

"Taking background samples locally will satisfy requirements in Chapter 62-780, F.A.C., which defines 'background concentrations' for use in risk assessment as coming from samples taken 'in the vicinity' of the site."

(See attached file: 35FS0707.doc)

Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

July 26, 2006

Ms. Sarah Reed
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, South Carolina 29419-9010

file: 35FS0706.doc

RE: Draft Feasibility Study: OU 22, Site 35, Building 1429, Public Works Maintenance Facility, Surface and Subsurface Soil, NAS Whiting Field

Dear Ms. Reed:

Mr. Jeff Lockwood, P.E. and I have reviewed the above document dated June 2006 (received July 11, 2006). Please adequately address the following in the final document:

1. The document has presented three remedies for the site and Mr. Craig Benedikt has requested the engineering controls in the form of concrete cover maintenance be evaluated as part of Alternative 2. I also suggest that digging and soil removal restrictions also be evaluated under Alternative 2. Those are especially applicable if the soil was contaminated above the FDEP Commercial/Industrial Scenario SCTL level(s).

2. On page 2-5 the statement is made that "Site 35 is completely covered by concrete and asphalt and, therefore has no surface soil to sample and no risk assessment was conducted on surface soil." I am not sure that "subsurface" is the proper descriptor and I suggest that a clarifying statement be added in this and subsequent documents that explains why "subsurface" soil was the only contaminated horizon and that because of the cover, the soil directly beneath was called subsurface soil.

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
Larry Smith, Tetra Tech, Tallahassee

ESN_____JJC_____