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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SITE 15 FEASIBILITY STUDY ADDENDUM NAS WHITING FIELD FL
8/8/2006
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

From: [Cason, James](#)
To: [Larry Smith \(E-mail\)](#)
Cc: [Mike Jaynes \(E-mail\)](#)
Subject: Site 15
Date: Wednesday, August 09, 2006 8:38:13 AM
Attachments: [15FSA0606.doc](#)

The attached letter has been sent up for signatures. It might be changed, but not usually.

Jim

<<15FSA0606.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."

Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail is communications and may therefore be subject to public disclosure.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

August 8, 2006

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

file: 15FSA0606.doc

RE: Draft Feasibility Study Addendum for Site 15, Southwest Landfill, Surface and
Subsurface Soil, NAS Whiting Field

Dear Ms. Reed:

I have reviewed the above document dated June 2006 (received July 9, 2006). The document is generally adequate; however, please consider the following in the final document:

1. The document has presented the alternative of Land Use Controls for the site. I suggest that digging and soil removal restrictions also be considered under Alternative 2 and/or 3. These need to be incorporated into the document.
2. Although not a direct reason to interrupt the document flow, this site is a large (21 acre) landfill at which a low number of soil samples were obtained. Land use controls, while a reasonable remedy, probably represents the minimum remedy for a site such as this.

Please finalize the document. 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____