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NAS WHITING FIELD  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON SITE 7 TECHNICAL SITE SUMMARY NAS WHITING FIELD FL  
8/16/2006  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

**From:** [Cason, James](#)  
**To:** [Larry Smith \(E-mail\)](#)  
**Subject:** letter  
**Date:** Wednesday, August 16, 2006 4:13:53 PM  
**Attachments:** [7TechMemo0606.doc](#)

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How does this sound?

<<7TechMemo0606.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.

**From:** [Cason, James](#)  
**To:** [Larry Smith \(E-mail\)](#)  
**Subject:** letter  
**Date:** Thursday, September 28, 2006 11:32:53 AM  
**Attachments:** [7TechMemo0606.doc](#)

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See attached.

<<7TechMemo0606.doc>>

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Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

August 16, 2006

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

file: 7TechMemo0606.doc

RE: Technical Site Summary for Site 7, NAS Whiting Field

Dear Ms. Reed:

I have reviewed the above document dated July 2004 (received June 27, 2006). The document presents evidence through the use of the Natural Attenuation Software (NAS), developed by the Navy, the United States Geological Survey and Virginia Tech University, that the soil contamination below the 80 feet below land surface (bls) level is minimal (within the Leachability Based on Groundwater Criteria; below Direct Exposure Residential Criteria) and which will attenuate within in approximately 12 years. Based on this document, I suggest the following:

1. Because the present number of groundwater monitoring points at the site are minimal, additional monitoring wells should be installed to better help understand the groundwater contamination regime at the site and help assess the contribution of the site to the existing contamination. Since the Navy is presently remediating the vadose zone at Site 7 from land surface to 80 feet bls, these wells can be used to decide when the soil contamination below 80 feet has been attenuated, based on the extent and distribution of groundwater contamination.
2. Please prepare a Monitoring for Natural Attenuation Plan for Site 7 that includes the location of the proposed monitoring wells and a monitoring plan that reflects the goal of determining when the contamination at Site 7 reflects only the migration of contaminated groundwater from upgradient of the site and that shows that the site is no longer contributing to that contamination.
3. I anticipate that after the previously described vadose zone remediation activities and the present proposed project is completed, Site 7 can be granted a "No Further Action" classification for soil.

Ms. Sarah Reed  
August 16, 2006  
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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\_\_\_\_\_