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NAS WHITING FIELD  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON SITE 13 DRAFT RECORD OF DECISION NAS WHITING FIELD FL  
8/17/2006  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

**From:** [Cason, James](#)  
**To:** [Sarah Reed \(E-mail\)](#)  
**Cc:** [Craig Benedikt \(E-mail\)](#); [Larry Smith \(E-mail\)](#)  
**Subject:** Site 13 ROD  
**Date:** Thursday, August 17, 2006 4:06:50 PM  
**Attachments:** [13ROD0706.doc](#)

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I have sent the attached letter up for signatures. It might be changed, but not usually.

Jim

<<13ROD0706.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 17, 2006

Ms. Sarah Reed  
Department of the Navy, Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive, PO Box 190010  
North Charleston, South Carolina 29419-9010

file: 13ROD0706.doc

RE: Draft Record of Decision – OU 12, Site 13 Sanitary Landfill, Revision 1, Naval Air Station Whiting Field

Dear Ms. Reed:

I have reviewed the above document dated July 2006 (received August 10, 2006). The document is generally well prepared; however, please address the following in the final document:

1. Page 2-7, top of page: remove reference to Site 18.
2. Page 2-11: the Residential SCTL for mercury is 3.0.
3. Page 2-13: top of page – there is an extra space in the first paragraph; at the bottom of the page in Section 2.10.1, Summary of Rationale for Remedy: please do not reference the Feasibility Study and instead simply state the components of Alternative 2.
4. Page 2-16, Table 2-4: for Alternative 3, if you conducted a soil removal, why would you need LUCs?
5. Page 2-17, Section 2.10.2: re-word “bullet” number 2 to prohibit the movement of soil to the surface or off-site. You may want to refer to Section 2.11 for wording guidance.
6. Page 2-21, Table 2-6: the footnote acronym for TRPH is not necessary.
7. References, Page R-1: the reference FDEP 2001 from page 2-3 is missing.

Ms. Sarah Reed  
November 13, 2008  
Page Two

Most of these comments are minor in nature and should require little effort to correct. Thank you for the opportunity to review this 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, TetraTech, Tallahassee

ESN\_\_\_\_JJC\_\_\_\_