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NAS WHITING FIELD  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON SITES 15, 17, AND 38 DRAFT RECORD OF DECISION NAS WHITING  
FIELD FL  
8/21/2006  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

**From:** [Cason, James](#)  
**To:** [Mike Jaynes \(E-mail\)](#)  
**Cc:** [Craig Benedikt \(E-mail\)](#); [Larry Smith \(E-mail\)](#); [Ron Joyner \(E-mail\)](#); [Sarah Reed \(E-mail\)](#)  
**Subject:** Documents  
**Date:** Monday, August 21, 2006 1:56:52 PM  
**Attachments:** [15ROD0606.doc](#)  
[38ROD0605.doc](#)  
[17PP0806.doc](#)

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The attached documents have been sent up for signatures. While they may be changed, they are not usually.

<<15ROD0606.doc>> <<38ROD0605.doc>> <<17PP0806.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 21, 2006

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

file: 15ROD0606.doc

RE: Draft Record of Decision 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 June 9, 2006). The document is generally adequate; however, please address the following in the final document:

1. The document has presented the alternative of Land Use Controls for the site. I have previously suggested in my review of the Feasibility Study Addendum that digging and soil removal restrictions also be considered. In review of a later version of the Proposed Plan (August 2006) for this site, I note that only soil removal is recommended. Both of these aspects (land use controls and soil removal) 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\_\_\_\_\_



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

August 21, 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: 38ROD0605.doc

RE: Draft Record of Decision for Surface and Subsurface Soil at Site 38, Building 2877,  
Former Golf Course Maintenance Building, Revision 0, Naval Air Station Whiting Field

Dear Ms. Reed:

I have reviewed the above document dated June 2005 (received June 29, 2005). The document is a No Action ROD pursuant to a prior successful site soil removal. The document is acceptable.

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\_\_\_\_\_



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

July 13, 2006

THIS LETTER IS NOT FINISHED 8-21-06

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

file: 17PP0106.doc

RE: Proposed Plan: Site 17, Crash Crew Training Area A, NAS Whiting Field

Dear Ms. Reed:

I have reviewed the above document dated January 2006 (received February 15, 2006). Please address the following in the final document:

1. According to my records, Site 17 was poorly characterized and had exceedences of contaminants above FDEP Commercial/Industrial Scenario SCTLs prior to emplacement of two feet of soil cover. For this reason, Land Use Controls should be placed on the site and they should include an appropriately worded soil excavation and removal restriction.
2. Based on my previous comments, there was a question regarding the adequacy of the soil cover on this site. Recent inquiries by myself have led me to conclude that the cover is not adequate.
3. If the Navy wishes to not change the present Proposed Plan, that is acceptable; however, I must receive assurance that these comments will be adequately addressed in the Record of Decision.

For historical perspective, I am attaching five comment letters that I submitted to the Navy for Site 17. 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

Attachments (5)

CC: Craig Benedikt, US EPA Region IV, Atlanta  
Ron Joyner, NAS Whiting Field  
Larry Smith, Tetra Tech, Tallahassee

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