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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
RESPONSE TO U S NAVY COMMENTS ON SITE 11 RECORD OF DECISION NAS WHITING
FIELD FL
7/30/2008
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 30, 2008

Mr. Benjamin T. Kissam, P.G.
Department of the Navy
Naval Facilities Engineering Command Southeast
Post Office Box 30, Building 103
Naval Air Station Jacksonville
Jacksonville, Florida 32212-0030

RE: **Response to Comments; Record of Decision for OU10 – Site 11, Southeast Open Disposal Area B Surface and Subsurface Soil, Naval Air Station Whiting Field, Milton, Florida (Tetra Tech NUS, Inc., July 14, 2008)**

Dear Mr. Kissam:

I have provided follow-up responses to you based on the comments that I received on July 14, 2008 from Tetra Tech NUS, Incorporated (TtNUS) concerning the subject document and my initial comments to this document. I have partially duplicated these responses by TtNUS and followed that with my additional follow-up responses below.

TtNUS Response to Comment #1: As per the TtNUS response (From RTC letter submitted in April 2008 and excerpt provided below) to UF Comment No. 13 on the above mentioned "Risk Assessment Re-evaluation of Soils at NAS Whiting Field Sites 9-18" document pertaining to Site 11, and the subsequent comment "The response is satisfactory" submitted by UF (in response letter dated May 16, 2008 and provided below), TtNUS understands this issue to be resolved.

Follow-up Response #1: The response is satisfactory.

TtNUS Response to Comment #2: Per the cover letter (attached) submitted with the revised LUC RD for Site 11 on June 16, 2008 and the cover letter (attached) for the revised Site 10 LUC RD submitted February 8, 2008, the requested language has been inserted into both documents and TtNUS understands this comment to be addressed.

Follow-up Response #2: The response is satisfactory. Please be sure that the requested language to be inserted into both of the LUC RDs for sites 10 and 11 come from my recent emails pertaining to these sites which I sent on June 24, 2008. This is FDEP's preferred language.

Page 2

Follow-up Comments to the Tetra Tech Response to Comment Letter; ROD for OU10, Site 11
Naval Air Station Whiting Field
July 30, 2008

Thank you for the opportunity to review this document. If you require additional clarification or other assistance please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.
Remedial Project Manager

Attachments (3)

JJC  ESN 



TETRA TECH NUS, INC.

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Tel 850.385.9899 • Fax 850.385.9860 • www.tetrattech.com

July 14, 2008

Mr. John Winters
Remedial Project Manager
Florida Department of Environmental Protection
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Subject: Response to Comments
Record of Decision (ROD) for OU 10 - Site 11, Southeast Open Disposal Area B
Naval Air Station Whiting Field
Milton, Florida

Dear Mr. Winters:

This letter submitted on behalf of the Navy, is in response to FDEP comments on the Final ROD for Site 11 at NAS Whiting Field and related University of Florida comments on Site 11 risk issues.

Attached, please find formal response to comments for your letter submitted to Sarah Reed (Navy RPM at the time) on March 3, 2008 and associated document excerpts and letters referenced in the comments.

As we have discussed previously, the Final ROD for Site 11 has been approved by USEPA and the LUC remedy described in subject LUC RDs for Sites 10 and 11 will be implemented upon approval of the document by the USEPA and FDEP.

If you have any questions or would like to discuss further, please contact me at (850) 385-9899 x31.

Sincerely,

A handwritten signature in black ink that reads "Michael O. Jaynes".

Michael O. Jaynes, P.E.
Senior Engineer/Project Manager

Enclosure

Cc: Mr. Craig Benedikt, USEPA Region 4
Mr. Tread Kissam, US Navy
Mr. Rich May, TtNUS

**RESPONSES TO FDEP COMMENTS ON THE FINAL RECORD OF DECISION
(ROD)/REMEDIAL DESIGN (RD) FOR OU 10 – SITE 11, NAS WHITING FIELD
MILTON, FLORIDA (TtNUS, 2007)**

FDEP Comment No. 1: The comments from the University of Florida's Center for Environmental & Human Toxicology concerning the "Risk Assessment Re-Evaluation of Soils at NAS Whiting Field Sites 9-18" pertaining to Site 11 and the overall general comments (see attachment) were not incorporated into this document. Unacceptable risks with respect to lead contamination will occur if residential Land Use Controls (LUCs) is use. Currently, lead was found at sample location 1-SL-02 at a concentration of 2,230 mg/kg which is above the FDEP's Commercial/Industrial Soil Cleanup Target Level (SCTL) of 1,400 mg/kg. As long as there are concentrations of lead above FDEP's Commercial/Industrial SCTL for this compound we cannot concur with the selected remedy. ...

TtNUS Response to No. 1:

As per the TtNUS response (From RTC letter submitted in April 2008 and excerpt provided below) to UF Comment No. 13 on the above mentioned "Risk Assessment Re-Evaluation of Soils at NAS Whiting Field Sites 9-18" document pertaining to Site 11, and the subsequent comment "The response is satisfactory" submitted by UF (in response letter dated May 16, 2008 and provided below), TtNUS understands this issue to be resolved.

From TtNUS response to comments (RTC letter - April 2008):

Site 11:

13. The recreational SCTL was not created for lead. Lead is a COC at this Site and, if recreational use is a possibility, an SCTL should be derived for this scenario. Additionally, the maximum lead concentration of 2,230 mg/kg may exceed the recreational SCTL.

TtNUS Response to No. 13:

Page 5-4 of the risk assessment provides an evaluation of surface soil lead concentrations. Although the maximum detected concentration of 2,230 mg/kg in surface soil (location 11-SL-02) exceeded the USEPA and screening level of 400 mg/kg for residential exposures (400 mg/kg is also the Florida residential SCTL), extensive surface soil sampling for lead in the immediate vicinity of location 11-SL-02 suggests very limited lead contamination in this area. The arithmetic mean lead concentration for 30 locations established by a 25-foot sampling grid in the vicinity of location 11-SL-02 does not exceed 150 mg/kg. Currently, there is no acceptable model for evaluating lead exposures in an adolescent trespasser population and consequently, no means to derive an alternate SCTL for lead based on this population. However, a health-protective approach (if one accepts that children are the most sensitive population with respect to lead health effects and with respect to the degree of lead absorption from the environment) is to evaluate hypothetical future residential exposures in children ages 0 to 7 years to lead in surface soil using the IEUBK lead model, as was done in the risk assessment for Site 11.

As recommended by the IEUBK model, the average concentration of lead in surface soil (93.1 mg/kg, all available surface soil data considered) was used as the model input for soil. Default parameters were used for the rest of the model input parameters. IEUBK model outputs are included in Appendix B of the risk assessment. The lead concentration of 93.1 mg/kg in surface soil results in less than 1 percent of future on-site child residents having a blood lead level greater than 10 µg/dL. This result does not exceed the USEPA goal of no more than 5 percent of children exceeding a 10 µg/dL blood lead level. Therefore, soil lead concentrations at Site 11 are safe for adolescent trespassers."

From UF response to TtNUS RTCs:

“Follow up Response #13: The response is satisfactory.”

FDEP Comment No. 2: Please be sure that the words “and/or residential-like” are inserted between the words “residential” and “uses” in the Land Use Control Remedial Design (LUC RD) document for Site 11. This did not occur in the Draft LUC RD for Site 10, ...

TtNUS Response to No. 2:

Per the cover letter (attached) submitted with the revised LUC RD for Site 11 on June 16, 2008 and the cover letter (attached) for the revised Site 10 LUC RD submitted February 8, 2008, the requested language has be inserted into both documents and TtNUS understands this comment to be addressed.

Winters, John

From: Winters, John
Sent: Tuesday, June 24, 2008 4:30 PM
To: 'Jaynes, Mike'
Cc: Winters, John; Nuzie, Eric; Benedikt.Craig@epamail.epa.gov
Subject: NAS W.F.; Site 10 draft RD language

Mike,

I have a few comments.

--Page 1, Second Paragraph: The ROD, dated September 2007, stipulates...contaminated soils on-site and *will restrict the site to non-residential use only. Non-residential land use restrictions prohibit residential and residential-like uses, including but not limited to any form of housing, child-care facilities, any kind of school including pre-schools, elementary schools, secondary schools, playgrounds and adult convalescent and nursing care facilities.*

--Page 1, Second Paragraph: Is the next sentence after the residential and residential-like language needed? That sentence is..*"These controls will preclude...and subsurface soils."*

--Page 3, Performance Objectives, Bullet #1: Remove the words...*"such as parks or trails."* Also, change the second sentence to...*"Also, restrict the site to non-residential use only. Non-residential land use restrictions prohibit residential and residential-like uses, including but not limited to any form of housing, child-care facilities, any kind of school including pre-schools, elementary schools, secondary schools, playgrounds and adult convalescent and nursing care facilities."*

If you have any questions or comments concerning these proposed changes please contact me.

John

John Winters, P.G.
Professional Geologist I
Florida Department of Environmental Protection
Bureau of Waste Cleanup
Federal Programs Section
850/245-8999
Fax: 850/245-7690
John.Winters@dep.state.fl.us

Winters, John

From: Winters, John
Sent: Tuesday, June 24, 2008 4:40 PM
To: 'Jaynes, Mike'
Cc: Winters, John; Nuzie, Eric; Benedikt.Craig@epamail.epa.gov
Subject: NAS W.F.; Site 11 draft RD language

Hello Mike.

I have exactly the same comments for the Site 11 draft RD as I do/did for the Site 10 draft RD. Please see my comments in the email for the Site 10 RD that I sent on June 24, 2008 at 4:30 pm.

John

John Winters, P.G.
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