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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON AVIATION GAS-E REMEDIAL ACTION PLAN MODIFICATION NAS
WHITING FIELD FL
10/6/2008
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 6, 2008

Mr. Benjamin T. "Tread" Kissam, P.G.
Department of the Navy
Naval Facilities Engineering Command Southeast
Building 903
NAS Jacksonville
Jacksonville, Florida 32212-0030

RE: Remedial Action Plan Modification, AVGAS Pipeline Section E (UST – 2) Naval Air Station Whiting Field, Milton, Florida (WRS Infrastructure & Environmental, Inc., September 19, 2008)

Dear Mr. Kissam:

I have reviewed the above document dated September 19, 2008 (received on September 25, 2008). This document is a modification to the December 2003 Remedial Action Plan (RAP) for AVGAS Pipeline Section E prepared by Tetra Tech NUS (Tt NUS 2003). The RAP addressed soil contamination resulting from a potential leak in Section E of the AVGAS pipeline. WRS Infrastructure & Environment, Inc. (WRS) is submitting this RAP Modification as a result of recent approved project scope changes. WRS was directed by NAVFAC to develop an alternative remedial approach, and complete as much of the project as possible within the current budget, while maintaining the intent of the approved RAP for the site. The Tt NUS 2003 RAP called for a soil excavation to be conducted at the site. Under the WRS RAP Modification soil will still to be excavated in accordance with the original RAP but now only to the extent practical due to budget constraints. In early 2008, WRS conducted additional soil assessment activities at the site to better assess the extent of petroleum impacted soil. The data was collected to evaluate whether the volume of soil requiring remediation could be reduced. Following this evaluation, WRS did conclude that the area of soil to be removed could be reduced while still removing petroleum contaminated soil above FDEP soil cleanup target levels (SCTLs) and most of the petroleum contaminated soil that could potentially leach contaminants to groundwater. WRS expects the excavation to be conducted using conventional earth moving equipment. Soil will be excavated while establishing a 1.5-foot horizontal to 1-foot vertical (1.5H:1V) slope in accordance with the Occupational Safety and Health Administration (OSHA) allowable slope for Type-C soils (29 DFR 1926.650). I concur with the modifications to the RAP that WRS is proposing. However, I/FDEP have the following comments pertaining to this document:

- 1. Estimated Volume of Excavation:** Mr. Jeff Lockwood, Professional Engineer for the Federal Program Section, also reviewed the above document. He provided one comment concerning the RAP Modification activities. He would like WRS to clarify the geometry of the excavation used to arrive at the estimated volumes of contaminated soil and clean overburden to be reused.

2. **Soil To Be Excavated:** Since the land surface to 10 foot below land surface (bls) area to be excavated is less than the 10 foot bls to 20 foot bls area what is to be done with the overburden? Is it to be removed as waste, or will it be stockpiled? If it is to be removed from the site then the cost for the Navy will increase. This information is unclear from this RAP Modification, and has the potential to add significant cost to this project.
3. **Clean Fill Material:** Clean fill material was not discussed in the RAP Modification. Fill material has the potential to add significant cost to this project. Where is the fill material coming from? How will it be tested to show that it is "clean"?
4. **Confirmatory Soil Sampling:** Are confirmatory soil samples to be taken of the bottom and sides of the excavation during remedial activities? Why or why not? This topic was not mentioned/discussed in this document.
5. **Groundwater Monitoring Following The Excavation:** Groundwater monitoring should be conducted following this remedial action. This was not mentioned/discussed in this document.

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

JJC 

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