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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON SITE 41 FEASIBILITY STUDY NAS WHITING FIELD FL
7/14/2009
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 14, 2009

Mr. Benjamin T. "Tread" Kissam, P.G.
Department of the Navy
Naval Facilities Engineering Command Southeast
Naval Air Station Jacksonville
Building 903
Post Office Box 30
Jacksonville, Florida 32212-0030

**RE: Draft Feasibility Study, for Site 41, Former Pesticide Storage Building 1485C,
Naval Air Station Whiting Field, USEPA ID #FL2 170 023 244, Milton, Florida (Tetra
Tech NUS, Inc., May 22, 2009)**

Dear Mr. Kissam:

I have reviewed the above document dated May 22, 2009 (received June 3, 2009 by email). The purpose of the Feasibility Study (FS) report for Site 41 is to develop remedial alternatives to address threats to human health and the environment resulting from contaminated soil. Remedial Action Objectives (RAOs) are used to develop, screen, and evaluate potential remedial alternatives to meet the objectives. "The Navy concludes from the data and technical evaluation presented in this document that the site conditions at Site 41 do not meet all the requirements under FDEP's Global Risk Based Corrective Action (RBCA) for Risk Management Options (RMOs) in accordance with Chapter 62-780, F.A.C., thus active remediation will be required to address the soil at this site." FDEP concurs with this statement. This document is generally adequate for its intent and purpose, and FDEP understands that RAOs addressing groundwater and leaching to groundwater will be addressed in the FS for Site 40. However, FDEP has several comments concerning the document which are stated below.

- 1. Page 1-20, 1.6.3 Risk Assessment Summary, USEPA Risk Assessment:** A space is needed between paragraphs 1 and 2.
- 2. Page 2-6, 2.1.2 Identification of Remedial Action Objectives, RAO 1:** "Industrial" should be changed to "residential" in this sentence.
- 3. Page 2-7, 2.1.3 Preliminary Remediation Goals:** The first bullet should read "The FDEP SCTLs (Chapter 62-777, F.A.C.) and the USEPA Region 9 PRGs for Residential and Industrial Direct Exposure will be used as PRGs."
- 4. Page 2-8, 2.2 Cleanup Goals:** Paragraph 2 should read "The current industrial land use scenario at Site 41 will remain for the foreseeable future. However, cleanup goals were developed for constituents exceeding residential and industrial level PRGs at the site. The cleanup goals for soil shall meet the lower of the FDEP SCTLs or USEPA Region 9 PRGs for direct exposure for each COC." Also, the bullets should show both the residential and industrial numbers from the FDEP and USEPA.
- 5. Page 2-8, 2.3 Estimated Volume of Contaminated Soil:** The first bullet should read "the volume of contaminated surface and subsurface soil was determined based on the residential direct exposure SCTLs as the soil cleanup goal, and was done again using the

industrial direct exposure SCTL as the soil cleanup goal." Then the next two bullets should show the volume of soil requiring remediation for both industrial and residential direct exposure. The next paragraph should be discussing both residential and industrial exceedences. Please revise accordingly. The residential figures may have to be added here.

- 6. Page 4-13, Balancing Criteria, Cost:** The last sentence under the Cost Section should be removed.

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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