

N60508.AR.000863  
NAS WHITING FIELD  
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT REMEDIAL INVESTIGATION REPORT SITE 1  
NORTHWEST DISPOSAL AREA NAS WHITING FIELD FL  
1/20/1998  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

# Department of Environmental Protec

09.01.01.0001

00398



Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

January 20, 1998

Ms. Linda Martin  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive, PO Box 190010  
North Charleston, SC 29419-9010

file: dri\_sl.doc

RE: Draft Remedial Investigation Report, Site 1, Northwest Disposal Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated October 1997 (received November 10, 1997). The following comments should be adequately addressed before the document can be considered final:

1. Section 6.1: please elaborate on the reason that the 1993 sampling data were not utilized in the document.
2. Section 6.2: In the last paragraph concerning less than risk-based screening concentrations, the guidance followed in the selection of HHCPs may be counter to the latest guidance in a memo from Ted Simon, USEPA, dated November 10, 1997 concerning Risk Assessments with the HSWA/RCRA Program. I recognize that the memo post-dates the document, but this should be checked. These comments also apply to footnote S in Table 6-1 (and perhaps others).
3. Section 6.5: this section indicates that the risk characterization methodology follows Subsection 2.5.5 of the GIR. To my knowledge, this document has not been finalized. The Navy should assure that discrepancies do not exist because of this.
4. Section 6.5.1: The FDEP target risk should be corrected to  $1 \times 10^{-6}$ .
5. Figures 6-2, et. seq.: the FDEP Target Risk should be added, as appropriate.
6. Table 6-9: the Florida Industrial SCGs should be added, as appropriate.
7. Tables 5-3 and 7-2 give different background screening levels for Zinc. Please correct the appropriate table. Additionally, the background screening levels for "organics" is

*"Protect, Conserve and Manage Florida's Environment and Natural Resources"*

*Printed on recycled paper.*

Ms. Linda Martin

Page Two

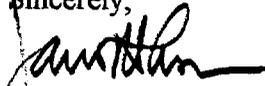
January 20, 1998

discussed. No such numbers are listed, yet it was indicated that they would not be used for screening. My question is, why make this statement?

8. Page 7-7: the use of the general term "inorganics" seems to border on "scientific slang." We are usually talking about selected inorganic species. I suggest the use of "selected" or other identifiers; for instance, "Toxicity resulting from selected inorganic exposures may..." or some similar usage. This is not a "burning issue" but it seems our publication would be improved by specificity since, after all, the soil on which we live and in which plants live is a mixture of "inorganics and organics" and represents a natural and beneficial arrangement. It is the specific organic and inorganic species which are sometimes detrimental.
9. I suggest that the recommendations in Section 9.2 be withheld until the materials leading to excess cancer risks (primarily Arsenic in surface soil) are adequately addressed. The statement (bullet # 11) that the HHRA indicated that "chemicals detected in soil and ground water...are not likely to pose an unacceptable carcinogenic or noncancer risk to...a future resident of the site" is not consistent with State guidelines, considering the Arsenic content of surface soils; we should reconsider the statement. A similar conclusion is also made in the Executive Summary.

I appreciate the opportunity to review this document. I look forward to discussing it in our Partnering meeting next week. If you have questions or require further clarification, please contact me at (904) 921-4230.

Sincerely,



James H. Cason, P.G.  
Remedial Project Manager

cc: Craig Benedikt, USEPA Atlanta  
James Holland, Naval Air Station Whiting Field  
Gerald Walker, ABB, Tallahassee

TJB B JJC JJC ESN ESN