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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FINAL DRAFT REMEDIAL INVESTIGATION REPORT SITE 18  
CRASH CREW TRAINING AREA NAS WHITING FIELD FL  
6/12/1998  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

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Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

June 22, 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

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RE: Final Draft Remedial Investigation Report, Site 18, Crash Crew Training Area, NAS  
Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated February 1998 (received February 16, 1998). The document is well written and presented in a clear format. I have only a few comments but they should be carefully considered by the Navy in preparing the final draft:

1. The report utilizes SCGs which were in effect during the time of report preparation. I do not object to this; however, I have utilized selected new or revised Soil Cleanup Goals (SCGs) in order to properly evaluate the site. I am referring specifically to the SCG for Total Recoverable Petroleum Hydrocarbon (TRPH) in soils as listed in Chapter 62-785, F.A.C. I feel I must consider TRPH using those SCGs since Site 18 is a site in which petroleum hydrocarbons are a primary contaminant and a component of the operations that were carried out at the site.
2. Based on data presented in the report, risks are predicted for future residents due primarily to arsenic in surface soil. In the conclusions, page 9-2, it states that remediation of surface soil would not substantially reduce exposure to arsenic. While the arsenic concentrations observed in surface soil at the site may be an expression of the natural background, the results of excavation and construction or other reasons, it may also be a result of the activities carried out by the Navy at this site. The Navy should address the contamination of the surface soil at Site 18 by, for instance, placement of an appropriate soil cover or other appropriate method which would control the direct contact of human and ecological receptors. More importantly, this action would also directly address the TRPH which is present in the surface soil in amounts up to about ten times the new industrial soil SCG for TRPH. As presented in the report, the site could conceivably be recommended for an industrial land use restriction in order to address the arsenic and other metal contaminants; if this were proposed, I could not support it because of the very high TRPH values that are present.

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

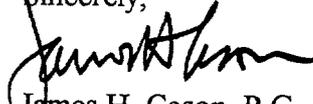
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3. I agree that a focused feasibility study be conducted to address the risk to a future resident or others (such as in an industrial or recreational scenario) and that the assessment also address the TRPH in the surface soil which is in excess of Florida's industrial SCG.

I appreciate the opportunity to review this document. 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  
Gerald Walker, Harding, Lawson and Associates, Tallahassee

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