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NAS WHITING FIELD  
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FINAL DRAFT REMEDIAL INVESTIGATION REPORT SITE 9  
WASTE FUEL DISPOSAL PIT AND SITE 10 SOUTHEAST OPEN DISPOSAL AREA NAS  
WHITING FIELD FL  
6/22/1998  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



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# Department of Environmental Protection

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 9, Waste Fuel Disposal Pit and Site 10, Southeast Open Disposal Area (A), NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated March 1998 (received March 16, 1998). The document is generally well written and presented in a clear format. The following comments should be adequately addressed by the Navy in preparing the final draft:

1. The report utilizes Soil Cleanup Goals (SCGs) which were in effect during the time of report preparation. However, because this site may utilize land use restrictions in lieu of cleanup to residential SCGs and because it is appropriate to utilize them for future considerations, I have also used the new SCGs in Chapter 62-785, F.A.C. in order to evaluate the site. In this case, only the residential SCGs for vanadium changed significantly which would affect the evaluation if cleanup to that level were proposed. Please use these SCGs for future site evaluations at NAS Whiting Field.
2. Based on data presented in the report, risks are predicted for future residents due primarily to arsenic in surface soil. Data presented for surface soil at Site 9 indicates the presence of significant amounts of arsenic (up to 10.1 mg/kg). At Site 10, up to 2,500 ug/kg of benzo(a)pyrene were noted. If the new SCGs were used, vanadium would also contribute significant risk to residents. In the Recommendations, page 9-2, it states that no further action is recommended for Sites 9 and 10 and that a focused feasibility study does not need to be conducted for these sites. Based on the above data, I cannot agree and request that the Navy re-evaluate the recommendations for Sites 9 and 10 and utilize the new SCGs for vanadium in doing so.
3. Based on a prior presentation to Department Staff and on the summary information furnished by letter to the Department, a request was approved in my letter to you of April 27, 1998 to utilize a site-specific Soil Cleanup Goal for arsenic of 4.62 mg/kg at Sites 1, 2, 9, 10, 11, 12, 13, 14, 15 and 16, with the following conditions:

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A. The sites may be utilized for activities that involve less than full-time contact with the site. This may include, but is not limited to, parks, recreation areas that receive heavy use (such as soccer or baseball fields), or agricultural sites where farming practices result in moderate site contact (approximately 100 days/year, or less).

B. The Navy must assure adherence to the land use by incorporating the site and conditions in a legally binding land use control agreement.

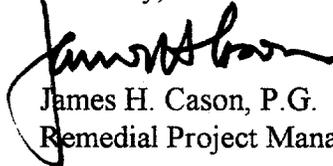
The Navy may want to apply the conditions of the above SCG conditions at Site 9 following the use of appropriate remedial methods to achieve allowable levels for arsenic.

At Site 10, the Navy should consider applying the same or other appropriate remedial methods to achieve benzo(a)pyrene concentrations at acceptable (industrial scenario, or other appropriate scenario) levels. Following this, the Navy should formulate appropriate land use restrictions for both sites which includes consideration of the high (according to the current SCGs) vanadium levels in surface soils.

4. Please incorporate these considerations in the final document.

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

TJB B JJC JJC ESN ESN