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NAS WHITING FIELD
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL DRAFT FEASIBILITY STUDY SITE 1 NORTHWEST
DISPOSAL AREA NAS WHITING FIELD FL

8/5/1998

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



09.01.01.0003

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Department of Environmental Protec

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 5, 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: fs@1a.doc

RE: Final Draft Feasibility Study Site 1, Northwest Disposal Area, NAS Whiting Field

Dear Ms. Martin:

Mr. Greg Brown, P.E., and I have reviewed above document dated June 1988 (received June 22, 1998). Mr. Brown's comments are attached. Mr. Brown's and my comments which follow should be addressed by the Navy in the final document:

1. The concept and implementation of a land use control agreement should be discussed in more detail, specifically that the agreement mandates an ongoing inspection program to insure compliance while the restrictions are in effect. Deed restrictions are not a part of the Land Use Restriction Agreement (LURA) as presently envisioned, nor have they ever been discussed as part of the agreement. I do not think they should be discussed in this document. There are many portions of the report where this should be corrected, including the Executive Summary, Table 2-4, Section 3.2.2, Table 3-1, Table 3-2 and Section 4.2.1. It should be made clear that the use restrictions remain in place, under agreement, until such time that the contamination at the site has been adequately addressed.
2. Section 2.1.1 Chemical-Specific ARARs: Florida has promulgated default soil cleanup target levels in Chapter 62-785, F.A.C. Since these default levels represent the Department's most current derivation of target levels, please insert this information in this section, in Table 2-1 and other appropriate sections as needed in place of references to the 1995 Soil Cleanup Goals. Place the rule reference in the Reference section. Finally, please consider and document the effect of these default cleanup target levels on the site and the proposed actions in the Feasibility Study.
3. I recognize that the ground water at NAS Whiting Field has been named as a separate unit; however, for clarity and for the record, please assure that we have adequately shown that the proposed remedy or recommendation is consistent with any ground water contamination at Site 2. Once the remedy is in place, we don't want to discover in the

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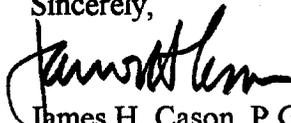
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future ground water evaluation that we should have addressed the problem in the approved remedy for this site. If the evaluation shows that is that there is no problem in this regard, please clearly state that this is the case. In my review of Table 2-2, it appears that of the two ground water contaminants at Site 2, aluminum and iron, both exceed the "2 times the arithmetic mean of background concentration" guideline which would indicate that they may be site related. This should be properly considered and addressed.

4. Appendix B: Please utilize the official signed correspondence for this section.

Thank you for 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

Attachment (1)

cc: Craig Benedikt, USEPA, Atlanta
Jim Holland, NAS Whiting Field
Gerald Walker, HLA, Tallahassee

TJB B JJC B ESN B h E N

Florida Department of
Environmental Protection

Memorandum

TO: Jim Cason, P.G., Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section *E*

FROM: Greg Brown, P.E., Professional Engineer II, *AB*
Technical Review Section

DATE: August 5, 1998

SUBJECT: Final Draft Feasibility Study, Site 1, Northwest Disposal Area, NAS Whiting Field, Milton, Florida.

I reviewed the subject document dated June, 1998 (received June 22, 1998). It is adequate for its intent as a draft document. In addition to your comments, I have the following comments for consideration in the final feasibility study:

1. Alternative 2: Site Closure, lists "deed restriction" as an activity. Proprietary controls such as deed restrictions are not applicable at active federal facilities.
2. Alternative 2: Site Closure, specifies a "closure and post-closure plan." A well prepared site-specific LUCIP should suffice for this. Separate closure and post-closure plans do not appear necessary.

If you have any questions, please call me at (850) 488-3935.