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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 11
SOUTHEAST OPEN DISPOSAL AREA B LANDFILL NAS WHITING FIELD FL
8/21/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

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

00436

09.01.11.0001

Virginia B. Wetherell
Secretary

August 21, 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 11, Southeast Open Disposal Area (B)
(Landfill), NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated April 1998 (received April 23, 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 the 1996 Soil Cleanup Goals. As we have previously discussed, the Navy should also compare the analytical results to the Chapter 62-785, F.A.C. Soil Cleanup Target Levels. This may be done as an appendix or supplement to the document if you desire or these values may be utilized in the existing tables. In either case, cleanup or other management decisions should be based on the information derived from the newer values. In some cases, such as vanadium, the SCTLs are lower than previously; in other cases, such as beryllium, the values have increased. In other cases, there are values which were not present previously, such as copper and TRPH. In all cases, the newer SCTLs should be used for investigations at NAS Whiting Field. Following this, the conclusions and recommendations should be revised, if necessary.
2. Please present figures which indicate the locations where soil and ground water exceeds cleanup target levels.
3. Based on data presented in the report, risks are predicted for future residents due primarily to arsenic and benzo(a)pyrene in surface soil. In the conclusions, page 9-2, it states that remediation of surface soil would not substantially reduce exposure from arsenic. While the arsenic concentrations observed in surface soil at the site may indeed 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. Please address this possibility.

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

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Ms. Linda Martin

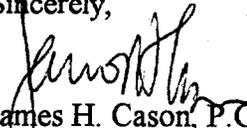
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4. I agree that a focused feasibility study be conducted to address the risk to a future resident or others (such as in an industrial or recreational scenario) from surface soil. Based on our recent conversations, I also understand that the Navy will address the ground water contamination, including evaluation of soil leaching, at this site in connection with the Site 40 basewide ground water assessment. If so, this should be clearly stated in the focused feasibility study.

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 R JJC Dr JESN CSN