

N60508.AR.000910
NAS WHITING FIELD
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING FINAL GENERAL INFORMATION REPORT NAS WHITING
FIELD FL
9/21/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



09.01.00.0088

00396

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 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

file: GIR_1.doc

RE: Final General Information Report, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the above document dated January 1998 (received January 30, 1998) and the supplemental material consisting of revised pages (Table of Contents, P. 3-25/3-26 and appendix material concerning the evaluation of arsenic at covered landfill sites which was received June 30, 1998). The document is acceptable as a general reference; however, please consider the following comments.

The GIR is a significant document in that it serves as a basic reference for our investigation at NAS Whiting Field and is an attempt to reduce the amount of redundant review to which we are subject and it is one that I refer to often while reviewing documents for the base; however, I must point out that some of the material that is presented is "perishable" in that it is constantly in a state of flux. I am thinking specifically of some of the material regarding risk assessment, especially ecological risk assessment since EPA is presently revising RAGS D. While I am in agreement with the need to standardize our background material and methods, I cannot preclude my not requiring or using any newly developed information, methods or guidance as they may become available from time to time. A prime example of this is the new Chapter 62-785, F.A.C. and the accompanying soil cleanup target levels which the Department is now utilizing in the review of soils in the place of the former soil guidelines outlined in Mr. John Ruddell's memo of September 29, 1995. There are other areas where good judgment mandates alternative information, such as the case of background well WHF-BKG-3S which is presented even though it indicates benzene and toluene contamination - not what one would expect from a background well. In any case, the document contains much useful information when used judiciously. In cases where different interpretations may be applied to data or other information, I will base my decisions on the best information I have at the time, irrespective of the information or evaluations that we may have previously adopted in the GIR; in other, hopefully rare, cases, I may ask for additional investigation or evaluation if the data in the GIR are not adequate. In all cases, I will continue using the GIR frequently, as I have found it to be a valuable reference for NAS Whiting Field.

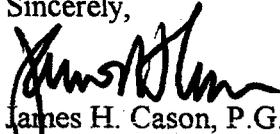
"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

Ms. Linda Martin
Page Two
September 21, 1998

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,



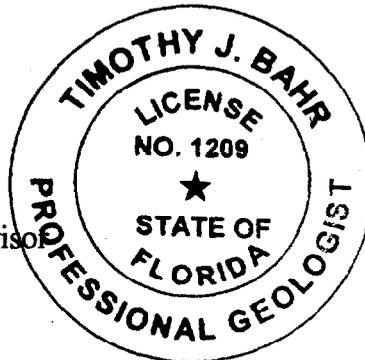
James H. Cason, P.G.
Remedial Project Manager

cc: Craig Benedikt, USEPA Atlanta
Jim Holland, NAS Whiting Field
Jim Williams, Harding Lawson Associates, Tallahassee

Reviewed by:



Timothy J. Bahr, P.G.
Professional Geologist Supervisor
Bureau of Waste Cleanup



9/22/98

Date

JJC  ESN ESN