

N60508.AR.000913
NAS WHITING FIELD
5090.3a

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

9/25/1998

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protec

09.01.01.0005

00402

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 25, 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: 1_rod1.doc

RE: Final Draft Record of Decision Site 1, Northwest Disposal Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed above document dated September 1998 (received September 8, 1998). I have the following comments which should be addressed in the final document:

1. The document should be properly certified according to Florida law.
2. The date for acquisition of a Memorandum of Agreement (MOA) regarding land use controls should be properly dated or the future acquisition date should be proposed.
3. Page 1-2: the inclusion of 5-year site reviews has not been previously discussed (to my recollection) nor has this procedure been adequately defined as to the components of the review or other particular aspects that will be accomplished during the review. Some explanatory discussion would be helpful.
4. Page 1-2: paragraph two should be modified as follows: "This ROD does not address actual or potential..." and "...facilitywide ground water has been identified..."
5. Section 1.5 Declaration Statement: the 5 year review is discussed again, a point that emphasizes its importance; I suggest that the Navy discuss how the review will be conducted, by whom and what the proposed standards for the review will be (see comment 3, above).
6. Section 2.2 Site History, etc.: the plural of aircraft is aircraft, not aircrafts. There are several of these usages, including in Table 2-1. Please correct them.
7. Section 2.3 Highlights of Community Participation: I suggest that the statement as to where the public review is available, in the documents of the Installation Restoration Program or the Administrative Record, would be well served by eliminating the acronyms

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

Printed on recycled paper.

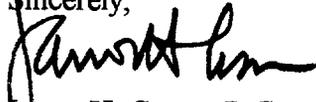
Ms. Linda Martin
Page Two
September 25, 1998

and simply stating the actual (above) locations. Additionally, the blank space for the comments should be completed.

8. Table 2-1, page 2-5: the statement regarding the "regional background averages" for surface soil should be removed because the reference is from a non-standard publication that has not been reviewed for applicability nor accepted by the State of Florida and I am concerned that the presence of this reference in the ROD lends a possibly unwarranted credibility and its continuing presence in future documents.
9. Table 2-8: the Florida Rules on Hazardous Waste Warning Signs (Chapter 62-736, FAC) were moved to Chapter 62-730, F.A.C.
10. Table 2-8: the Florida Soil Target Cleanup Levels (SCTLs), Chapter 62-785, FAC, are adopted values, not simply guidance. The SCTLs should be considered "Relevant and Appropriate" and "Action Specific."
11. References, page Ref-1: the date for the Memorandum from John Ruddell should be dated September 29, 1995.
12. Please complete the transcript and the material from the Public Comment Period, Section 3.2.

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

TJB B JJC JJC ESN ESN