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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 12
TETRAETHYL LEAD DISPOSAL AREA NAS WHITING FIELD FL
11/16/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

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Lawton Chiles
Governor

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Kirby B. Green, III
Secretary

November 16, 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 12, Tetraethyl Lead Disposal Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated April 1998 (received May 4, 1998). The following comments should be adequately addressed by the Navy in preparing the final draft:

1. As we have previously discussed for other sites at NAS Whiting Field, please compare all soil and ground water data to the TCLs in Chapter 62-785, F.A.C. If you choose, this can be presented and discussed in an appendix.
2. Please note that monitoring well WHF-12-1 is a cross-gradient well with respect to Site 12 and furnishes little site-specific data.
3. Please prepare a surface soil contaminant map (figure), similar to Figure 2-1, which depicts the surface soil contaminant levels areally.
4. On page 5-38, aluminum is discussed as being less than background, yet it is higher than both the state and federal MCLs. A similar problem is illustrated in Table 6-2 (page 6-7). Please present information and discuss the situation with the background sampling sites, both soil and ground water. Please justify how (why) the value given for arsenic (and other analytes) is representative of "background."
5. Table 6-8: what does the abbreviation of the ELCR, "NE," mean?
6. Figure 6-2 (page 6-21) and Figure 6-4 (page 6-23): please correctly indicate the Florida Target Risk level of 1E-06 and remove or explain the arrow which presently (incorrectly) refers to that risk.

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

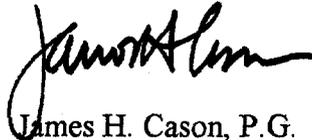
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7. Section 6.6 (page 6-20): it has not been shown nor necessarily accepted that the amount of arsenic in the surface soil is "naturally occurring." I suggest replacing the "is" in the paragraph of bullet #4 with "may," which makes the statement acceptable.
8. Section 9.2, Recommendations: does the discussion in the paragraph of bullet #3 refer to surface soil? This should be stated if that is the case. Finally, this section should include and properly account for the risks that are attributed to future residents from arsenic in surface soil. Contrary to the recommendation in this section, a feasibility study should be conducted which evaluates the options based on the findings of this study and recommends adequate remediation practices, land use restrictions, or other methods by which the Navy addresses the site contamination.

If you have any questions or need further clarification, please feel free to contact me.

Sincerely,



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

cc: Craig Benedikt, EPA Region IV, Atlanta
Jim Holland, NAS Whiting Field
Jim Williams, HLA, Tallahassee

TJB B ESN  JJC 