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NAS WHITING FIELD
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT PROPOSED PLAN FOR SITE 2 AND PROPOSED
PUBLIC PRESENTATION OPEN NORTHWEST DISPOSAL AREA NAS WHITING FIELD FL
11/30/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protec

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Lawton Chiles
Governor

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

Kirby B. Green, III
Secretary

November 30, 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: Draft Proposed Plan for Site 2 and Proposed Public Presentation for Site 2, Open Northwest Disposal Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject documents dated November 1998 (received November 4, 1998). I have not received or reviewed the revised final draft of the Site 2 Feasibility Study subsequent to my comments of August 5, 1998. In order to keep the processing moving, I am furnishing the following comments which should be adequately addressed by the Navy in preparing the final drafts; however, I cannot participate in the Public Hearings until the Feasibility Study has been finalized and the Proposed Plan and the Feasibility Study are in agreement.

Proposed Plan

1. Investigation Findings, page 2: the "RI" acronym is used prior to discussing what it means. As I have previously stated, acronyms should be used sparingly in a public document.
2. Groundwater, page 2: the use of "within" is confusing; it seems that "below" is a better word.
3. Ecological Risks, page 2: this section may be better just before the section on Human Health Risks since the paragraph beginning with "As noted..." more logically follows the Human Health considerations.
4. I think that "LUCs" should not be used; writing out "Land Use Controls" is not that onerous.
5. Sentence discussing the nine criteria: strike out "pros and cons of."
6. Picture on page 4: penetrometer is misspelled.

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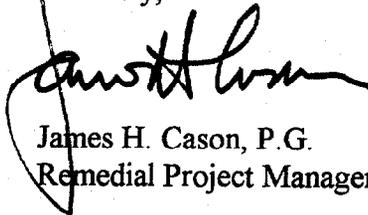
Ms. Linda Martin
Page Two
November 30, 1998

Proposed Plan Presentation

1. The discussion on risk assessment did not discuss or mention ecological risks.
2. Under "Options that were evaluated," physical removal was not discussed.
3. My previous comment on "LUCs" is still applicable.
4. The general flow chart for the Installation Restoration Process does not cover possible IM phases or a CMS phase.

For your use, I am attaching my hand-marked copy of the documents. 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
William Kollar, HLA, Tallahassee

TJB B ES SN JJC JJC