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NAS WHITING FIELD  
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING DRAFT REMEDIAL INVESTIGATION REPORT SITE 15  
SOUTHWEST LANDFILL NAS WHITING FIELD FL  
12/8/1998  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

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Lawton Chiles  
Governor

Twin Towers Building  
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Kirby B. Green, III  
Secretary

December 8, 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 Remedial Investigation Report, Site 15, Southwest Landfill, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated June 1998 (received June 30, 1998). Based on my review and since we are planning on addressing the ground water investigation at that time, I suggest that the Partnering team should examine the adequacy of the soil and ground water data in this document at the Partnering meeting in January. Site 15 is an unlined, uncapped industrial landfill in the Sand and Gravel Aquifer and I am not comfortable simply concluding that "all ground water issues will be addressed as part of the RI for the facility ground water study to be completed in the future." I will be much more comfortable addressing the ground water from a basewide basis once the basic contamination relationships of the site soils, buried debris and the ground water at the individual sites are generally known. Two years ago, when the Partnering team was considering the possibility of naming the facility ground water as a separate unit, my understanding was that each individual site would be adequately assessed. Does this mean that all sites will be fully characterized prior to the basewide ground water assessment? The answer is, no, but it is necessary that we have a good enough understanding of each site so that certain tasks, such as interim actions, if appropriate, can be accomplished now when the site is still under active assessment. For the record, I feel this way about every site at NAS Whiting Field. Site 15 typifies this situation and I believe that we need to adequately characterize the contaminant regime before concluding that we are finished and can move on to other things. In addition to this general comment, the Navy should adequately address the following comments in preparing the final draft:

1. As we have previously discussed for other sites at NAS Whiting Field, please insure that the soil, surface water and ground water data are evaluated with respect to the soil, surface and ground water (Table 1 and Table 3b) values in Chapter 62-785, F.A.C. Please note that the evaluation for soil should be the lower of either the direct exposure or the appropriate leachability level, if ground water is indicated to be contaminated. Please modify the appropriate tables to reflect this change. Please reevaluate the existing COPC, risk evaluations, etc., as necessary to also reflect this change. Table G-1 should be corrected to reflect the screening concentrations for those contaminants that were

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detected in significant concentrations in the ground water; for example, the screening value for total xylenes is 300 ug/kg, not 100 ug/kg. Note that Table G-3 lists incorrect Florida groundwater guidance concentrations for 1,2-dichloroethene, chlorobenzene, naphthalene, xylenes and cyanide. Some of the TCLs in the Department's former guidelines, 1994 Ground Water Guidance Concentrations, have been superseded by the values in Chapter 62-785, F.A.C. (Table 3b). Finally, the previous Soil Cleanup Goals Memoranda from Mr. John Ruddell and others should not be used since they have also been superseded by Chapter 62-785, F.A.C. The use of the TCLs from Chapter 62-785, F.A.C. will eliminate the errors such as those seen in copper, vanadium and others presently noted in Tables 5-9 and 5-10. Finally, footnote 12 in Table 5-10 (page 5-44) is incorrect in that the 1998 FDEP document is not appended and my name in the references (page Ref-3) is misspelled.

2. Please present a modified version of Figure 3-4 which shows the analytical values for significant contaminants in the site ground water such as benzene and TCE. If the ground water contaminant data are plotted as requested, there is the suggestion that some of the TCE contamination that is observed may originate from Site 15. The figure will also illustrate the areal distribution of contaminants at Site 15 and also the fact that TCE and petroleum compounds are found in the ground water between Site 15 and the base boundary. I suggest that this be included and discussed in Section 9.1, Conclusions. In addition, a statement should be added which relates the contaminants in the soil and ground water, including exceedances of leaching values from Chapter 62-785, F.A.C., if any are present. All of the previous suggestions will help make the final report more comprehensive and help link the data from Site 15, which has significant ground water contamination, to the information that will be obtained in the basewide ground water study.
3. Please provide a discussion for the use of the terms, "shallow," "intermediate" and "deep" when discussing monitoring wells. A summary table which explains the depth ranges for each type and which groups the various wells into those classifications would be good. A cross-section diagram similar to the one presently used for the Clear Creek area would also help the reader understand the situation, especially if the diagram can be related to the figure that was requested in comment 2.
4. I have concerns as to whether the characterization of the subsurface soil for Site 15 is adequate since only five samples were obtained and there was no testing to determine if the landfill is a continuing source of contamination to the ground water. If a cap is determined to be a potential remedy in the future, additional information regarding the ground water levels and how they may interact with the base of the landfill will also be required in order to assess the adequacy of the cap. In this regard, a review of the Test Pit and CPT Logs data in Appendix C is quite informative, especially Test Pit 15-06, which notes the presence of "solvent cans with solvent." With respect to those CPT logs, there is much information to be obtained from it and I respectfully suggest that prior to

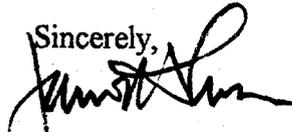
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preparing a focused feasibility study (which I think is not appropriate at this time), the author of that study should carefully review it .

5. Figure 6-6: please correct this figure, placing the FDEP acceptable risk level as 1E-06.

I appreciate the opportunity to review this document. I look forward to discussing Site 15 next month. 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  
Rao Angara, Harding, Lawson and Associates, Tallahassee

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