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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 14  
SHORT TERM SANITARY LANDFILL NAS WHITING FIELD FL  
12/17/1998  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Buddy MacKay  
Governor

# Department of Environmental Protection

09.01.14.0001

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

Kirby B. Green, III  
Secretary

December 17, 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 14, Short-Term Sanitary Landfill, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated April 1998 (received May 4, 1998). In revising the final draft, the Navy should adequately address the following comments:

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 surface and ground water (Table 1) and the soil (Table 2) values in Chapter 62-785, F.A.C. Please note that the evaluation for soil should be the lower of either the appropriate Direct Exposure (I or II) scenario or the leachability level. Please modify the various tables to reflect this change. Please reevaluate the existing COPC, risk evaluations, etc., as necessary to also reflect this change. Finally, the outdated Soil Cleanup Goals Memorandum from Mr. John Ruddell and the memorandum from Ms. Ligia Mora-Applegate dated April 5, 1995 should not be used and references to them should be removed. This comment applies directly to Table 5-8, 5-10 and 5-14 in Chapter 5, in Table 6-1, 6-2 and 6-3 in Chapter 6 and to other appropriate tables in subsequent chapters.
2. Table 5-14, footnotes: in Table 5-14, page 5-40, a statement is made within the context of footnote 7 regarding "a number of enforceable and nonenforceable State of Florida Regulations." This statement is misleading in that it implies that some ground water guidance concentrations and Secondary standards are "nonenforceable" when in fact they are enforceable within the scope of a cleanup program such as the present program at NAS Whiting Field. In 1997, the Florida Legislature adopted Chapter 97-277, Laws of Florida, which mandated that the Department should apply State Water Quality Standards within the context of risk-based corrective-action principles for Brownfield Sites. Please refer to Chapter 97-277, Section 5 (1)(g)1, in which it states that this should be accomplished "...based on the minimum criteria in Department Rule. (and which) shall consider lifetime cancer risk of 1.0E-6.. (and) the naturally occurring background

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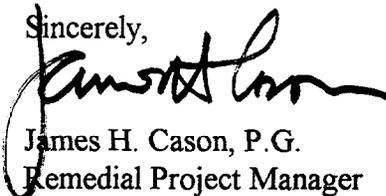
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concentrations or nuisance, organoleptic and aesthetic considerations." The water and soil TCLs in Tables 1 and 2 of Chapter 62-785, F.A.C. were developed according to that mandate and subsequently incorporated and adopted. Although the TCLs in the rule follow legislative mandate for Brownfield Sites only, they are representative of default contaminant levels of soil and water which the Department considers applicable to all cleanup programs. Based on this, I respectfully suggest that the statement regarding nonenforceability is inappropriate.

3. Table 5-8: although it should be corrected as a result of comment 1, above, the Florida Cleanup Goals for vanadium are significantly different from what is shown. Please insure that all Florida Cleanup Goals are checked for accuracy. Please note also that vanadium in Table 6-1 should be a chemical of potential concern because the correct screening value is 15 mg/kg (from Table 1, Chapter 62-785, F.A.C.) and five of the six samples exceeded this value. Please review and correct all subsequent tables.
4. Please include Figure 6-1, Site 14 Complete Exposure Pathways for Human Receptors.
5. Figure 6-4: please correct the USEPA Risk Range (it does not include acceptance by FDEP).
6. Section 6.8, Summary of HHRA for Site 14: the statement that, "It is likely that naturally occurring arsenic contributes to the FDEP target risk level exceedance" is misleading in that this has not actually been shown to be the case. Substituting the word "possible" for the word "likely" is more accurate.
7. Section 9.1, Conclusions: please revise according to the information developed based on using the correct Florida TCLs. Please reconsider the recommendations, if necessary.

If you have any questions or need further clarification, please feel free to contact me at 850-921-4230.

Sincerely,



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

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

TJB  ESN  JJC 