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NAS WHITING FIELD
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LETTER REGARDING DRAFT REMEDIAL INVESTIGATION REPORT FOR SITE 13
SANITARY LANDFILL NAS WHITING FIELD FL
2/23/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

09.01.13.0001

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Jeb Bush
Governor

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

David B. Struhs
Secretary

February 23, 1999

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: 13ri1.doc

RE: Draft Remedial Investigation Report, Site 13, Sanitary Landfill, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated October 1998 (received October 13, 1998). In this document, the ground water will be assessed as part of the facility basewide ground water assessment. As such, my comments will address contaminant concerns only in surface and subsurface soil; however, I am concerned with any possible relationship between the site soil and ground water and should a relationship be indicated at a later date, I may reassess the comments in this, or subsequent, letters concerning Site 13. In order for the document to be considered final, please address the following comments:

1. The title of the report should be "The Remedial Investigation Report for Surface and Subsurface Soil at Site 13, Sanitary Landfill."
2. Table 5-7, 5-11 and others: the soil and ground water contaminant levels should be compared to the TCLs for each respective media in Chapter 62-785, F.A.C., including the leaching values for all contaminants. In cases where the leaching values are exceeded, what does the Navy intend to do?
3. The State of Florida has granted a site-specific industrial value for the covered landfill sites (including Site 13) at NASWF. This value and the conditions attached to it (land use restrictions) should be discussed and cited in the text and appropriate tables (such as Table 5-9); the letter should also be included in the Appendix.
4. The site-specific value that was previously discussed for arsenic is exceeded according to Table 5-9, but I cannot tell how many times and where those values occurred aerally. Please prepare a figure which depicts the locations where residential/industrial values of contaminants in surface soils are exceeded so that decisions may be made regarding adequacy of contaminant delineation. Please prepare a similar figure (or modify an existing figure) for ground water contaminants.

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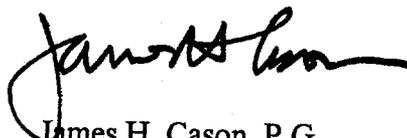
5. Section 6.0, Human Health Risk Assessment: please utilize the TCLs in Chapter 62-785, F.A.C., for the assessment and in the various tables, as previously noted in comment 2.
6. Table 6-7: the exposure point concentration should be 7, not 5.3, since only one sample was detected as having contamination and using one-half the CRDL only serves to dilute the single positive sample.
7. Table 6-8: The correct ELCR for Site Maintenance Worker should be 9×10^{-7} .
8. Table 6-10 and 6-11: the table should utilize the values from Chapter 62-785, F.A.C., including the leaching value for arsenic. In Table 6-10, reference is given to site-specific goals in appendix G. The discussion is in appendix H and the background screening concentration is not discussed at that point. Where does the "3" come from? In Table 6-11, where does the value of 6.2 for the background screening concentration come from?
9. Table 6-12: the EPC for trichloroethene is incorrect.
10. Please prepare a summary table of background values for soil and ground water, including references pertaining to their origin.
11. Please carefully consider the possibility at the sites in this document where concrete, either from floors or runway/taxiways may be serving to apparently prevent a complete soil exposure pathway at certain sites. It is important that the Navy address this concern, as it is directly related to the problem of not only future exposure risks, but also in the future when the concrete may be removed or repaired, at which time it may complete the exposure pathway or may contaminate the surface/subsurface soil and ground water by virtue of leaching from soil that was formerly covered by concrete. Has the Navy adequately addressed both the risk and the leaching scenario for any or all of the sites that are covered in the RI? If not, we need to discuss this and assure that it has been addressed properly.
12. Section 9.0, Conclusions: the ground water gradient is southeast; using the figure requested in comment 3, confirm or justify that contaminants are not migrating off the site.
13. Section 9.0, Conclusions: considering that surface soil and ground water analyses yielded significant risks for future residents, please justify the statement on page 9-2 that says "The contaminants of concern with respect to human health detected in surface soil, subsurface soil, and ground water do not pose unacceptable carcinogenic risk to any receptors evaluated." Am I missing something?

I am aware that the Navy is considering background evaluation methods at NASWF. It seems that the final response to these comments would await that determination. Additionally, please present assurance that comparison of the soils at this and all other sites are compared to the correct background soil type.

Ms. Linda Martin
Page Three
February 23, 1999

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
Rao Angara, HLA, Tallahassee

TJB ^{JRC} JJC ^{JJC} ESN ^{ESN}
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