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NAS WHITING FIELD  
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LETTER REGARDING DRAFT RECORD OF DECISION FOR SITE 1 NORTHWEST  
DISPOSAL AREA NAS WHITING FIELD FL  
5/24/1999  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

09.01.01.0006

00403

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

May 24, 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: 1rod2.doc

RE: Draft Record of Decision for Site 1, Northwest Disposal Area; NAS Whiting Field

Dear Ms. Martin:

I have reviewed above document dated May 1999 (received May 21, 1999) and offer the following comments which should be addressed by the Navy in the final document:

1. Section 1.2, Statement of Basis and Purpose: the last sentence in paragraph three which begins, "A fundamental premise..." should be reworded since it is an incomplete sentence.
2. Section 1.2, Statement of Basis and Purpose: the fourth sentence draws language from the MOA such as, "It is understood..." in the second sentence. This is not appropriate in the ROD and should be reworded.
3. Section 2.4, Scope and Role of RA Selected for Site 2: the Navy should consider the effect of subsurface soil with respect to residential exposures if it may be exposed in the future (as we discussed at the last Partnering meeting) and how it should be included in the RA, if necessary. The evaluation should be in the form of a letter report which adequately documents the evaluation, the summary of which then can be included in the RA. In either case, whether or not the subsurface soil is a risk driver, the letter report should document that it was evaluated and the results discussed in this section, if necessary.
4. Section 2.4, page 2-6, paragraph 4, which begins with, "The MOA...": In the first line, "will be" should be substituted for "is." In the second line, "would be" should be replaced by "is being." In line 11, beginning with, "Although the terms.." and ending with "understood and" should be replaced by "It is.." yielding a sentence that begins, "It is agreed by the Navy..." On line 16, delete the portion of the sentence which says, "it is understood that the protectiveness of," leaving the remaining portion of the sentence.

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Ms. Linda Martin

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5. Section 2.5.5, Surface Soil: in the last line of the section, on page 2-8, delete the words, "variance for..." and insert "approved."
6. Section 2.5.4, Subsurface soil: in the manner discussed comment 3, please assure that we have adequately addressed the subsurface soil contaminants, especially with respect to the Florida requirement to evaluate subsurface soil using the residential scenario. This also includes other sections such as 2.6 and Table 2-2 and in the discussion in Table 2-7.
7. Table 2-8: The reference to the Florida Soil Cleanup Goals, September 1995, should be deleted, along with the reference to it in the Reference section.
8. Appendix B, Land Use Control Implementation Plan: please include the consideration of subsurface soil as discussed in comments 3 and 6, as (and if) appropriate. In the section, Other Pertinent Information, replace "beneath" with "if present at." It is further suggested that the sentence ending with "potable or non-potable water supply." include "without adequate treatment" after the word, "supply."

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  
Jim Holland, NAS Whiting Field  
Rao Angara, HLA, Tallahassee

TJB \_\_\_\_\_ JJC \_\_\_\_\_ ESN \_\_\_\_\_