

N60508.AR.000994
NAS WHITING FIELD
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LETTER REGARDING DRAFT RECORD OF DECISION FOR SITE 2 OPEN NORTHWEST
DISPOSAL AREA NAS WHITING FIELD FL
5/24/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

09.01.02.0007

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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: 2rod1.doc

RE: Draft Record of Decision for Site 2, Open 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 and portions 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 2-5, paragraph 4 (which begins with, "The MOA...": 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 2.5.3, Surface Soil: this section discusses that arsenic and beryllium are risk drivers. Please check all other sections to assure that beryllium is mentioned in this regard when it is appropriate. It appears that we mostly discuss arsenic when we maybe should include beryllium in the discussion(s).
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.

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____