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NAS WHITING FIELD  
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LETTER REGARDING DRAFT REMEDIAL INVESTIGATION REPORT FOR SITE 17 CRASH  
CREW TRAINING AREA NAS WHITING FIELD FL  
6/18/1999  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protec

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Jeb Bush  
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David B. Struhs  
Secretary

June 18, 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: 17ri1.doc

RE: Draft Remedial Investigation Report, Site 17 Crash Crew Training Area; NAS Whiting Field

Dear Ms. Martin:

I have reviewed above report dated February 16, 1999 (received February 17, 1999). Please address the following comments in the final report:

1. Figure 3-1: this figure is similar to others that have been produced for the IRP program in that it depicts a site characterized by a number of biased sampling points with a fairly large portion of the site remaining unsampled. We have discussed this on several occasions; however, I think the Navy should assess whether or not the site has been sufficiently characterized before proceeding on to the next stage in the process. As you are no doubt aware, there has been a tendency for unknown or unusual contamination to be discovered during some interim actions, causing much consternation and concern from the regulators and the Partnering team in general. Additional assessment may be warranted at this site.
2. Figure 5-1: Please address the apparent discrepancy in the ground water flow direction presented on this figure, given that the flow direction is perpendicular to the tributary stream shown in the lower portion of the figure.
3. Tables 5-6, 5-7 and 5-8 present soil sampling results in tabular fashion, which is good; however, there is no way to relate the exceedances of the various constituents in their vertical and horizontal planes. Please consider plotting those data on a figure which will enable evaluation of their adequacy and extent in the assessment. Additionally, please utilize the MCLs and SCTLs in Chapter 62-777, F.A.C. for contaminant assessment, including leaching evaluation, throughout the document. Please change all table references to other rules when Chapter 62-777, F.A.C. is utilized.
4. Table 5-8 includes leachability considerations for the various analytical constituents which, in many cases are exceeded, in some cases to a great degree. Please state in the document how the Navy will adequately address this situation. It seems to me that the question of

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leaching should be answered during the soil assessment of the site, rather than during a basewide ground water evaluation. That way, the questions regarding the possible remediation of soil will be answered during that portion of the assessment, rather than "finishing" the soil assessment and perhaps needing to conduct a remedial effort at a later date. I recognize that there is not complete agreement on the part of all members of the Partnering team on this concept, but I feel I must state my position for the record for each separate site.

5. On page 3-1, the concept of background is discussed which references the NAS Whiting Field General Information Report. I am aware of the extensive effort presently underway by the Navy to assess background at NAS Whiting field; given that the Navy's background report is due soon, does the Navy intend to rewrite this section utilizing the results of that assessment?
6. In the assessment, please note instances where residential SCTLs are exceeded in the subsurface soils and account for this, considering Department guidance concerning land use restrictions or remediation if those soils are exposed in the future.
7. Figure 6-4: please correct the depiction of the FDEP acceptable risk level.
8. Section 6.8: please explain further why, in bullet 1, that HHCPs detected in surface soils do not pose unacceptable carcinogenic risks to receptors evaluated based on FDEP risk criteria. It appears to me that they do pose unacceptable risks. Further, I am not sure that the subsurface soils can be concluded to not pose risks. Please refer to the discussion in comment 10, below. Finally, I couldn't agree more with the statement on page 6-33 that it is "likely that the naturally and/or anthropogenically occurring concentrations of arsenic contribute to the FDEP target risk-level exceedance." However, I think the Navy was attempting to attribute some or most of the risk level to naturally-occurring arsenic; unfortunately, it did not succeed.
9. Section 7.8: in the second paragraph on page 7-32, it is stated that "it is unlikely that plant cover and/or biomass at Site 17 would be reduced such that small mammals and birds would be affected." I have trouble with the way the previous sentence states that "no evidence of stressed vegetation *outside* of the burn pits was observed." I italicized the word "outside" because it is misleading in that the relationship of total site area to burn pit area is not discussed and I cannot tell whether or not the areas *inside* the burn pits is significant with respect to the areas *outside* the burn pits. Please address this apparent discrepancy.
10. Section 9.1 Conclusions: bullet 4 states that TRPH sampling results for subsurface soils did not exceed the industrial and leachabilities values from Chapter 62-785, F.A.C. Discounting any variables in this conclusion because those values from Chapter 62-777, F.A.C. have not been utilized in the evaluation and after checking the text discussion and the tables for subsurface soils, I am concerned because I don't see how we can say that the

Ms. Linda Martin

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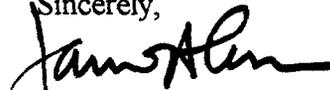
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subsurface soils (which we define beginning at 2 feet bls and continuing down) are not contaminated. This is because the subsurface sampling regime was conducted from 5 feet below land surface (bls) to 60 feet bls (Section 5.4, page 5-31). As you can understand, my concern centers around the 2 to 5 foot interval directly below contaminated areas in the surface soils. It appears that the interval that was not sampled could be contaminated; accordingly, I cannot agree with the conclusion that the subsurface soil interval does not exceed residential or leaching values. I suggest that we should discuss this problem at the next Partnering meeting. Please note that this discussion also applies to Section 6.8, as discussed in comment 8, above.

11. As I have stated in comment 3, above, please compare the surface and subsurface soils and the ground water sample analytical values to the MCLs and SCTLs in Chapter 62-777, F.A.C. Some of the values have changed significantly. Additionally, all constituents need to be closely evaluated for subsurface exceedances for residential values which should be so noted and taken into account in the conclusions and recommendations.

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

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