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NAS WHITING FIELD  
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LETTER REGARDING FINAL FEASIBILITY STUDY SITE 12 NAS WHITING FIELD FL  
8/11/1999  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protec

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Jeb Bush  
Governor

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

David B. Struhs  
Secretary

August 11, 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: 12FS2.doc

RE: Final Feasibility Study, Site 12, Tetraethyl Lead Disposal Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the above document dated July 1999 (received July 8, 1999). Please address the following comments in the final document:

1. The Feasibility Study has addressed our previous comments from the first draft, which was received in February; however, there are still a number of references to Chapter 62-785, F.A.C. that should be changed to Chapter 62-777, F.A.C. In addition, please utilize the GCTLs and SCTLs in Chapter 62-777, F.A.C. for analytical constituent assessment, remembering to evaluate the leaching values for soils irrespective of whether or not analytes are found in ground water which exceed specific GCTLs. When there are instances where subsurface soil exceeds the SCTLs for a residential direct exposure scenario, these should be noted and taken into account when making site recommendations, especially in cases where the site background may exceed the SCTLs. I believe that this is the case with Site 12.
2. Section 2.1.1: the discussion related to "Brownfields" sites and to Chapter 62-785, F.A.C. should actually reference Chapter 62-777, F.A.C. References to "Brownfields" are not appropriate. This also applies to the references in Table 2-1 and Table 2-2 and to the bibliographic references at the end of the document.
3. Please insure that the evaluation and discussion of subsurface soil on page 2-10 and in other sections is consistent with my comments in 1., above.

Finally, as we discussed in detail at the last Partnering meeting, I have received your formal request that Site 12 be included in the list of covered landfills that the State of Florida has granted a site-specific industrial SCTL for arsenic. I concur with that request. Please modify the text in the last two paragraphs on page 2-9 to include that the Navy requested the inclusion of Site 12 in the "covered landfill" designation and that the State of Florida has agreed to do so. Please include a copy of your letter of request with the documentation in Appendix A. You may also want to include this letter in Appendix A as proof of my agreement, if you choose.

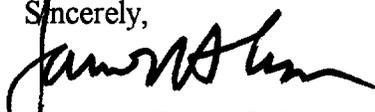
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Ms. Linda Martin  
Page Two  
August 11, 1999

If you have any questions, 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  
Rao Angara, HLA, Tallahassee

TJB <sup>1</sup>/<sub>3</sub> ESN ~~ESN~~ JJC 