

N60508.AR.001025
NAS WHITING FIELD
5090.3a

LETTER REGARDING DRAFT RECORD OF DECISION SITE 12 NAS WHITING FIELD FL
8/16/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

09.01.12.0005

00441

Jeb Bush
Governor

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

David B. Struhs
Secretary

August 16, 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: 12ROD1.doc

RE: Draft Record of Decision, Site 12, Tetraethyl Lead Disposal Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the above document dated July 1999 (received July 21, 1999). Please adequately address the following comments in the final document:

1. Section 1.2, Statement of Basis and Purpose: the Navy should refer to the site in this section as one of several "covered landfills" which have been granted a site-specific industrial SCTL for arsenic that is different than that in Chapter 62-777, F.A.C. The documentation in that regard should be in the bibliography (including the Navy's request and the State response). The discussion of the site-specific SCTL was covered well in Section 2.4, but there are several other places where this reference should be utilized, including in the discussions of Alternative 2 and in Section 2.10, Statutory Statement.
2. Section 2.3: please be sure the dates and meetings in this section reflect the actual circumstances.
3. References to Chapter 62-685, F.A.C. should be changed to Chapter 62-777, F.A.C.
4. Page 2-5, paragraph 2: "Facility wide" should be hyphenated. In the next sentence, I suggest that it may be reworded to say, "...chemicals in the groundwater are found to pose a threat.." Please change the reference to the MOA from "an" to "a," in the second line of the last paragraph and amend the last sentence to read "...human health and the environment as provided in the MOA."
5. Section 2.5.2, Background: I suggest that the numerical results of the background determinations should be included in this section since they are mentioned in subsequent paragraphs. Additionally, and following the background discussion, the Navy should discuss the subsurface analytical data in the context of background and for the instance where removal of surface soil would result in exposure to receptors (as we have previously discussed).

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

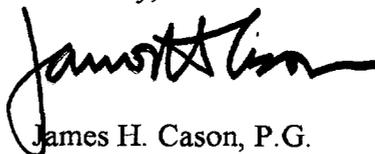
Printed on recycled paper.

Ms. Linda Martin
Page Two
August 16, 1999

6. Section 2.5.3, Surface soil: please note that the maximum concentration of iron does not exceed the Florida surface soil residential SCTLs in Chapter 62-777, F.A.C. Please correct the numbers in this discussion. Check whether it should also be included in the discussion in Section 2.5.6. and Table 2-2.
7. Section 2.5.4, Subsurface Soil: I suggest that the analytical results for the appropriate analytes should be presented in this section. Additionally, the discussion of subsurface exposures that was discussed in comment 5., above, may be better presented in this section. If warranted, the paragraph at the top of page 2-9 may be the place to consider the recommendation that land use restrictions should be enacted to include subsurface soil that may exceed residential or other appropriate exposure levels. At Site 12, the soil two feet below land surface exceeds the Direct Exposure I levels in Chapter 62-777, F.A.C. and the covered landfill, site-specific industrial SCTL for arsenic. As I have said previously, at sites (such as Site 12) where the SCTLs in the soil two feet below land surface exceed Direct Exposure I levels, the Navy should ensure that if those soils are later excavated or otherwise exposed, that soil removal, treatment and disposal measures will be accomplished. This should be taken into consideration in the Record of Decision (ROD) and since land use restrictions are being contemplated for this site, those assurances should be incorporated into those land use restrictions.
8. I cannot approve the final Record of Decision until the Navy, EPA and the State of Florida have executed a Memorandum of Agreement regarding land use restrictions at Naval Air Station Whiting Field. The final ROD should reflect that the MOA is in place and should not have contingent statements in it such as is in Section 1.2 (page 1-1), 1.4 (page 1-2), 2.4 and (page 2-5).
9. Appendix B: I assume that this section will contain the description of Site 12 that will be incorporated in the Land Use Restriction MOA and not the MOA itself. Is this true?

Thank you for the opportunity to review this document. 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  ESN  JJC 