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NAS WHITING FIELD
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LETTER REGARDING THE TRANSMITTAL OF THE FEASIBILITY STUDY FOR SURFACE
AND SUBSURFACE SOIL SITES 3, 4, 6, 30, 32 AND 33 NAS WHITING FIELD FL
3/6/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



09.01.03.0006

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Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

March 6, 2000

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: fs3etal_1.doc

RE: Feasibility Study for Surface and Subsurface Soil for Sites 3, 4, 6, 30, 32 and 33, Revision 0, October 1999, NAS Whiting Field

Dear Ms. Martin:

Mr. Greg Brown and I have reviewed the above document dated October 1999 (received October 27, 1999). Mr. Brown's comments are attached. Please address his comments, particularly comments 2 and 3. For the record, I am waiting on the Navy's responses to comments from Dr. Steve Roberts, which were generated during review of the RI for this site; otherwise, I have no additional comments.

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

Enclosure (1)

cc: Craig Benedikt, EPA Region IV, Atlanta
Phillip Ottinger, TetraTech NUS, Oak Ridge
Charlie Goddard, FDEP Northwest District

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Memorandum

Florida Department of Environmental Protection

TO: Jim Cason, P.G., Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section ^B

FROM: Greg Brown, P.E., Professional Engineer II, Technical Review Section ^B

DATE: February 24, 2000

SUBJECT: Feasibility Study for Surface and Subsurface Soil at Sites 3, 4, 6, 30, 32, and 33, Naval Air Station Whiting Field, Milton, Florida.

I reviewed the subject document dated October 1999 (received October 27, 1999). As a Feasibility Study, the subject document is more than adequate for its intent. I have some minor comments for the record.

1. The media, classes of contaminants, remedial action objectives, general response actions, process options, alternatives, etc., are virtually identical for each of the sites with minor exception. The text for each chapter is essentially the same for each site with only minor modification. The Navy could have created a much more succinct document if it creatively combined the feasibility analysis for each site to eliminate the redundancy.
2. Preliminary Remediation Goals are based in part on a future industrial land use assumption. This creates a *de facto* land use control element in each alternative before the feasibility analysis even begins in earnest. Risk managers should be given an opportunity to assess the tradeoffs of alternatives with and without restricted land use since there are opportunities costs with land use controls.
3. Some sites have a few isolated surface soil sample locations with arsenic slightly above the PRG of 3.7 mg/kg (commercial/industrial land use assumption). The Navy may be able to show with additional characterization that these minor isolated surface soil exceedances are consistent with reference background concentrations. There may not be a need for remedial action of arsenic in surface soil.

If you have any questions, please call me at (850) 488-3935.

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