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NAS WHITING FIELD  
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LETTER REGARDING THE TRANSMITTAL OF THE U S NAVY RESPONSE TO FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION DRAFT FEASIBILITY STUDY  
COMMENTS FOR SURFACE AND SUBSURFACE SOILS AT SITES 3, 4, 6, 32 AND 33 NAS  
WHITING FIELD FL  
3/30/2000  
TETRA TECH

**TETRA TECH NUS, INC.**800 Oak Ridge Turnpike, A-600 ■ Oak Ridge, Tennessee 37830  
(423) 483-9900 ■ FAX (423) 483-2014 ■ www.tetrattech.com

0300-E114

March 30, 2000

Commanding Officer  
Department of the Navy  
SOUTHNAVFACENGCOM  
ATTN: Ms. Linda Martin, Code 1859  
Remedial Project Manager  
2155 Eagle Drive  
North Charleston, SC 29419

Subject: Response to FDEP's Draft Feasibility Study Comments  
For Surface and Subsurface Soil  
Sites 3, 4, 6, 30, 32, and 33  
NAS Whiting Field, Milton, Florida

Reference: CLEAN Contract No. N62467-94-D-0888  
Contract Task Order No. 0028

Dear Ms. Martin:

Tetra Tech NUS, Inc. is pleased to submit responses to FDEP's comments on the Draft Feasibility Study for Surface and Subsurface Soils at Sites 3, 4, 6, 30, 32, and 33, Naval Air Station Whiting Field in Milton, Florida.

Copies of the responses have been forwarded to the persons listed below on behalf of Southern Division, Naval Facilities Engineering Command for Naval Air Station Whiting Field.

Please call me at (865) 483-9900 if you have any questions or comments regarding this submittal.

Sincerely yours,

Phillip E. Ottinger  
Task Order Manager

PEO:tko

Enclosure

cc: Mr. Rao Angara, Harding Lawson Associates (1 copy)  
Mr. Craig Benedikt, USEPA (1 copy)  
Mr. Jim Cason, FDEP (2 copies)  
Mr. Terry Hansen, Tetra Tech NUS (1 copy)  
Mr. Jim Holland, NAS Whiting Field (1 copy)  
Ms. Amy Twitty, CH2M Hill (1 copy)  
Mr. Gerry Walker, Tetra Tech NUS (1 copy)  
Ms. Debbie Wroblewski, Tetra Tech NUS (w/o enclosure)  
File/Edb

## RESPONSE TO COMMENTS

### Florida Department of Environmental Protection Comments Feasibility Study for Surface and Subsurface Soil at Sites 3, 4, 6, 30, 32, & 33

March 30, 2000

#### Comments

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 redundancy.**

#### Response:

The feasibility study (FS) was originally prepared with the media, classes of contaminants, remedial action objectives, general response actions, process options, alternatives, etc., for all six sites discussed together to reduce redundancy. However, since six sites were being discussed there was no site continuity and it was hard to follow and keep straight what was proposed for each site. To make it easier to follow and understand, the FS was restructured to have each site discussed in a separate chapter of the report. In hindsight, the report could have been more concise and still have each site discussed in separate chapters for continuity.

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 manager 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.**

#### Response:

Due to the infrastructure (runways, aircraft hangers, and maintenance buildings) present at or adjacent to the sites in questions it is almost certain they will remain industrial in the future. In consideration of the above information, the NAS Whiting Field Partnering Team decided during preparation of the Draft FS to evaluate remedial alternatives based on the anticipated future industrial land use.

In addition based on preliminary cost estimates, the cost to implement a residential land use remedial alternative (without land use controls) will be much greater than the cost of the industrial land use remedial alternatives included in the FS making it highly unlikely to be selected by the Navy.

## RESPONSE TO COMMENTS

### Florida Department of Environmental Protection Comments Feasibility Study for Surface and Subsurface Soil at Sites 3, 4, 6, 30, 32, & 33

March 30, 2000

(continued)

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.

Response:

The Navy has recently prepared and submitted to the State of Florida for review and concurrence a background study titled "Comprehensive Analysis of NAS Whiting Field Background Condition – Statistical Testing and Geochemical Evaluation. This comprehensive study documents that many of the minor inorganic surface soil exceedances are consistent with background concentrations. Upon concurrence of this report by the State of Florida, the procedures used in this background study will be used to reevaluate the background concentrations of inorganics in surface and subsurface soils at NAS Whiting Field.