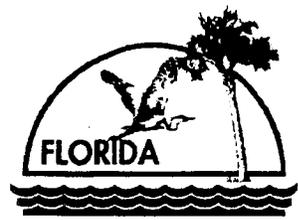


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NAS WHITING FIELD
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT PROPOSED
PLAN FOR SURFACE AND SUBSURFACE SOILS AT SITE 9 NAS WHITING FIELD
8/24/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

FILE COPY

Jeb Bush
Governor

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

David B. Struhs
Secretary

August 24, 2000

Ms. Linda Martin
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, South Carolina 29419-9010

file: 9&10pp1.doc

RE: Draft Proposed Plan, Surface and Subsurface Soils, Site 9, Waste Fuel Disposal Pit and Site 10, Southeast Open Disposal Area (A), NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated June 2000 (received May 30, 2000). The Navy should adequately address the following comments before the document can be considered final:

1. A figure should be presented similar to, but at a larger scale, to Figure 1 which presents the site boundaries and contaminant data and area of soil cover emplacement so that the reviewer can easily understand that an interim action has already taken place and has adequately addressed the surface soil contaminants with regard to protection of human health and the environment. This information was previously requested and the Navy stated, following the request during the IRA review, that "the final RI Reports and/or feasibility Studies for each of these sites... will relate the pre-existing and newly-determined contaminant levels, the excavated and filled areas and the covered areas."
2. Using the above figure, the Proposed Plan should clearly describe the nature of the interim action that took place and that Alternative 2 is an action which places land use controls on the sites to further protect human health and the environment. With respect to the soil cover that has already been placed on the site, this is a major action that, if the reader knew only what is presented in the Proposed Plan, he or she may not even realize that such an action took place. It appears that the document is simply a series of statements that have been assembled without overall site knowledge. It should be written to reflect the actual conditions and what is proposed in a clear and easily understood manner.
3. Please make provision or state regarding the proposed land use controls, that they will adequately address an instance in which the present cover may be removed and receptors may be exposed to the subsurface soil.

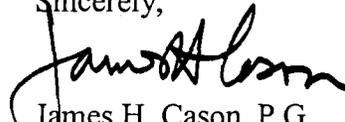
"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Ms. Linda Martin
Page Two
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4. In the section on Ecological Risks (page 2), what is the intent in the second paragraph where it says that the "...risks are significantly administered due to the soil cover"? I have no idea as to the meaning of that sentence.
5. The last bulleted item in the section on "Investigation Findings," should be removed since ground water contamination aspects are not a formal part of this Plan since it will be investigated under Site 40.
6. With the thought in mind that the soil cover was placed on these sites in 1999, does the Navy really intend to recommend in the "Basis for the Proposal" section (page 2) that targeted soil removal should take place? Forgive me for being direct, but has anyone proofed this document prior to me receiving it?

I will be happy to work closely with Harding Lawson and Associates in reviewing the changes to this document so that we can continue to make progress toward our goal of finalizing the work on these sites. 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 Region IV, Atlanta
Jim Holland, NASWF
Rao Angara, Harding Lawson and Associates, Tallahassee

TJB  JJC  ESN 