

N60508.AR.002443
NAS WHITING FIELD
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FEASIBILITY
STUDY AT SITE 11 NAS WHITING FIELD
8/24/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

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, SC 29419-9010

file:11fs_1.doc

RE: Draft Feasibility Study, Site 11, Southeast Open Disposal Area B (Landfill), NAS
Whiting Field, Milton Florida

Dear Ms. Martin:

I have reviewed the above document dated April 2000 (received April 13, 2000). Please adequately address the following comments:

1. Please add a bulleted item in Section 1.0 (page 1-2) stating that an IRA was performed at the site, the description of which is contained in Appendix J of the RI.
2. Please justify why the alternatives proposed do not include how the dieldrin at the site will be addressed. I think this is important since the RI identified ecological risks at sampling site 11-SL-02 due to lead *and* pesticides. If the Navy believes that those risks have been addressed in the soil removal action, it should justify that belief. Please note that the RI stated in the Summary of Ecological Assessment for Site 11 (page 7-28) that "sublethal impacts to top predator populations are likely over the entire area of Site 11." For reference, the contaminant map presented as Figure 5-3 in the RI, documents the distribution of dieldrin at Site 11 and the figure in Appendix C of the FS documents high levels of dieldrin at several sampling points at Site 11.
3. If the ecological risk from pesticides at the site cannot be reconciled, that problem should be properly addressed in the FS.

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.

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

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Ms. Linda Martin
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Remedial Project Manager

Cc: Craig Benedikt, EPA Region IV, Atlanta
Rao Angara, Harding Lawson & Associates, Tallahassee
Jim Holland, NASWF

TJB____ESN____JJC