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NAS WHITING FIELD
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON FINAL REMEDIAL
INVESTIGATION AT SITE 17 NAS WHITING FIELD
9/6/2000
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

September 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: 17ri2.doc

RE: Final Remedial Investigation Report for Site 17, Crash Crew Training Area, NAS
Whiting Field

Dear Ms. Martin:

I have reviewed the above document dated March 2000 (received March 30, 2000). I have previously commented on the draft document on June 18, 1999. Please adequately address the following comments before the document can be considered final:

1. The Navy's responses to the regulatory agency review comments are not included in the document. It was agreed previously that these would be included in an appendix. Please add those comments, including these present comments.
2. In my previous comments, numbers one and three, I expressed the need to adequately present a figure showing the extent of the various contaminants at Site 17. I also asked for this in the Interim Remedial Action Report that Bechtel produced. The Navy's response dated August 1999 states 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." The present document only presents summary information from the Bechtel IRA report. Please prepare a figure that fulfills the Navy's statement of intent (above). I believe that this figure is an important part of the RI since it will document the contaminants and the adequacy of the soil cover in a manner that is easily understood, even by non-technical reviewers. Please note that Figure 5-3 does not adequately fulfill that intent since it requires a reviewer to interpret the tabular data with respect to spatial extent.
3. My previous comment number six requested that the Navy compare subsurface soil analytical results to residential SCTLs and note the exceedances. Was this accomplished?
4. My previous comment number 8 asked why the Navy stated that HHCPs in surface soil did not pose an unacceptable carcinogenic risk based on FDEP risk criteria. This has not

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been addressed. Please do so. As a matter of information, my concern was because Table 5.9 indicated that arsenic was found in surface soil at concentrations up to 5.9 mg/kg, exceeding even the site-specific industrial/commercial SCTL for arsenic that was granted by the Department for the "covered landfills" at NASWF.

5. For the administrative record, the fact that the soil interval from 2 feet to 5 feet below land surface (BLS) at Site 17 was not sampled (my previous comment number ten) should be acknowledged in the discussion on the subsurface soil. Actually, since two feet of soil cover was placed on the site during the IRA, that interval is now the 4-7 foot BLS interval.

Since this document has not been finalized, the Navy should prepare the figure that was requested in comment two, above, and place it in the appendix. This will insure that all available data are in the RI and will make the subsequent documents (such as the Feasibility Study) follow in a logical order. I recognize that some of my comments have been offset by the actions taken in the IRA; however, since the IRA predates the final date of the RI, an adequate description and data presentation based on the IRA should be included in the RI and my comments should be adequately addressed.

Thank you for the opportunity to review this document. If you have questions or need further clarification, please contact me at (850) 921-4230.

Sincerely,

James H. Cason, P.G.
Remedial Project Manager

cc: Craig Benedikt, USEPA, Atlanta
Jim Holland, NASWF
Charlie Goddard, FDEP Northwest District Office, Pensacola
Rao Angara, Harding, Lawson Associates, Tallahassee

TJB _____ JJC _____ ESN _____