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NAS WHITING FIELD
5090.3a

LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FEASIBILITY
STUDY FOR SITE 13 NAS WHITING FIELD
8/28/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

FILE COPY

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Jeb Bush
Governor

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

David B. Struhs
Secretary

August 28, 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: 13fs1.doc

RE: Draft Feasibility Study, Site 13, Sanitary Landfill, Naval Air Station Whiting Field,
Milton, Florida

Dear Ms. Martin:

I have reviewed the subject document dated July 1999 (received July 8, 1999). The Navy should address the following comments before the document can be considered final:

1. In the Executive Summary, page iii, paragraph four, please state that this document does not include considerations for ground water at Site 13, since ground water will be evaluated in the Site 40 investigation. The ground water exclusion should also be discussed in the first paragraph of the Introduction.
2. In the Introduction, paragraph three, first sentence; add "soil" after the "of" where it says, "and impact of contamination at the sites," on page 1-2, fourth bulleted item following "and impact of.." and in Section 1.2, Purpose of the FS Report: in the first line, replace "media" with "soil."
3. Figure 1-2: the "Y" ditch is a physical feature and should be shown in the figure.
4. Section 2.1.1, Chemical-Specific ARARs: State of Florida SCTLs are contained in Chapter 62-777, F.A.C., not in Chapter 62-785, F.A.C.
5. Table 2-1, page 2-6: the reference to Chapter 62-785, F.A.C. should be deleted. This also applies to the reference in Table 2-2, page 2-8, where Chapter 62-777, F.A.C. should be inserted.
6. Page 2-11, Subsurface Soil: the statement that soil cleanup goals only apply to surface soil is not correct. Please correct this sentence to include the subsurface soils and the fact that if subsurface soils do not meet direct exposure 1 criteria, they will have to be

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Ms. Linda Martin

Page Two

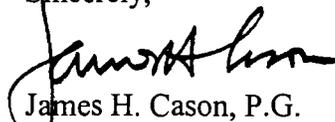
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addressed if they are removed since receptors could come in contact with them. Please also delete the reference to brownfield sites at the end of the paragraph.

7. Page 2-12, third line: the statement that RAOs will not be developed for subsurface soils at Site 13 is not entirely true. Even though they may not be remediated, they will at least be considered when determining if the site is clean or if land use controls are imposed. Please make this correction to account for any contaminated subsurface soils.
8. Page 2-13, Table 2-4: RAO three discusses "complete" closure. Please correct as we have previously discussed at the Partnering meetings. Please reconsider the third sentence in the same paragraph, which discusses surface soil.
9. Page 2-13, third bulleted item: as long as the assumptions that are made here are used only for estimates, they are acceptable. If actual cleanup is done, the assumptions are not valid.
10. In the References, please include a reference to Chapter 62-777, F.A.C. and delete the reference to Chapter 62-785, F.A.C. unless it has actually been used or considered.

Thank you for the opportunity to review this document. If you have any questions or need further clarification, please contact me at (904) 921-4230.

Sincerely,



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

cc: Craig Benedikt, USEPA Atlanta
Jim Holland, NAS Whiting Field
~~Rao Angara, HLA, Tallahassee~~

TJB JJC ESN