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NAS WHITING FIELD  
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FEASIBILITY  
STUDY FOR SITE 18 NAS WHITING FIELD  
9/7/2000  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

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David B. Struhs  
Secretary

September 7, 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: 18fs1.doc

RE: Draft Feasibility Study for Site 18, Crash Crew Training Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated March 2000 (received March 28, 2000). I note that the Navy has not responded to my letter of April 21, 1999 concerning the final Report of Investigations for Site 18. Please do so in order that we may finalize that document. Regarding the Feasibility Study, please adequately address the following comments before the document can be considered final:

1. Site 18 is one of four sites that were covered with a permeable soil cover in early 1999. For each of the other sites, I have asked that a figure be prepared that relates the site contaminants with the emplacement of the soil cover so that adequacy of the cover to isolate the site contaminants could be demonstrated. At most of the other sites, I requested that the figure be placed in the Site RI. Since the Site 18 RI has not been formally finalized, I request that the figure be prepared for inclusion into the RI. I am particularly interested in areas where contamination was identified in the RI and how the Navy determined which areas were to receive soil cover. In actuality, these questions should have been answered either during the IRA or in the final IRA report. In any case, all of my subsequent comments and decisions regarding Site 18 documents, beginning with this FS, presume that the Navy will adequately fulfill this request.
2. Section 1.5, RI Summary, page 1-8: the second "bulleted" item is not exactly true. I suggest that the Navy state which receptors that this statement may apply to, rather than saying, "to the receptors evaluated." To do otherwise seems to be misleading.
3. I suggest that the next to last "bulleted" item that discusses groundwater be deleted, since groundwater is being evaluated in Site 40. This comment also applies to paragraph four, page 2-5, which begins, "For Site 18, no inorganic.."
4. Table 2-2, page 2-6: please put the correct State of Florida Leachability value for benzo (a) pyrene in column five.

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

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5. Page 2-7, paragraph four: the data or a figure which confirm this contention are not available (or, at least, I have not seen it). The figure requested in my first comment should alleviate this situation.
6. Table 3-1, page 3-3: the groundwater section, especially the statement that COCs are not leaching to groundwater, should be deleted from this document since the FS does not pertain to groundwater at Site 18.
7. Section 3.2 and others on page 3-4, 3-5, 4-4, 4-5, 5-2 and 5-3: whenever the LUCAP is discussed, the Navy should refer to it as the Memorandum of Agreement (MOA), in the present tense, not the future tense, since it has already been adopted. LUCAP was the proper term before the MOA was adopted; now, however, MOA should be used.
8. If they do not apply to Site 18, why were Appendices A and B placed in the document? Am I missing something?
9. In the absence of the figure requested in my first comment, I cannot justify the outline or the calculations in Appendix C.

It may be because the general guidelines for preparing a Feasibility Plan are so specific that they don't follow what was actually done at Site 18, but it seems to me that the document would be more understandable if it simply followed the facts: the facts as presented in the RI and the facts of the IRA, followed by the evaluation of the possibilities in the FS. I know all the facts are in the FS, but they are difficult to follow! I appreciate the opportunity to review this document. If you have questions or require 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  
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TJB \_\_\_\_\_ JJC \_\_\_\_\_ ESN \_\_\_\_\_