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NAS WHITING FIELD
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT PROPOSED
PLAN FOR SITE 16 NAS WHITING FIELD
9/5/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

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Jeb Bush
Governor

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

David B. Struhs
Secretary

September 5, 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: 16pp2.doc

RE: Draft Proposed Plan for Site 16, Open Disposal and Burning Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the above document dated July 2000 (received July 21, 2000). Some of my comments will closely follow comments on the draft Feasibility Plan, which were submitted on September 1. Please adequately address the following comments before the document can be considered final:

1. Please substitute "limited soil" for references to "hot spot."
2. Figure 1 (page 1) would be greatly improved if the "cross-hatching" were removed and basic outlines ("stick outlines") of the North and South airfields placed in the outline of the property.
3. In the discussion of Human Health Risks on page 2, please define "PAHs." In the same section, please define or consider removing the "ELCR" acronym.
4. In the section on Human Health Risks, what does the Navy mean (or what does the Navy imply) when in the third "bulleted" section it states: "However, it should be noted that this ELCR is based on one sample." Would the conclusions be different if the statement were something like: "All samples taken were contaminated." Since only one sample was taken and it was contaminated, the second quote is true, albeit somewhat nebulous. I think the Navy should put only information that will help the public understand what we are trying to do at Site 16.
5. In the Basis for the Proposal section, page 3, my previous comments regarding "hot spot" and "LUCs" also apply. In this same section, the comma immediately following "remedial investigation" on line one has an extra space before it.

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6. In the Glossary of Terms (page 4), the reference to Polychlorinated Biphenyls should be removed since they are not discussed in the document. In place of that, a definition and explanation of PAHs might be added.

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_____