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NAS WHITING FIELD
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FEASIBILITY
STUDY FOR SITE 16 NAS WHITING FIELD
9/1/2000
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 1, 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: 16fs2.doc

RE: Draft Feasibility Study for Site 16, Open Disposal and Burning Area, NAS
Whiting Field

Dear Ms. Martin:

I have reviewed the above document dated May 2000 (received May 12, 2000). In addition to the specific comments, which follow, please be aware that my concern is (as always) that we will have sufficient information to make the best decisions consistent with the protection of human health and the environment. Site 16 represents a site that was a long-term landfill at which the routine burning of discarded materials with petroleum products was common. We have identified environmental concerns at Site 16, which are connected with the presence of metals (cadmium and zinc), in the surface soil. Please keep in mind as we develop our remedies for the site that we must address those ecological concerns in a rational and workable manner. My specific comments are:

1. I am not sure that use of the term, "hot spot" is really applicable at this stage of the evaluation process. To me, using that term implies knowledge (primarily through more complete delineation of the contaminant in question) that a contaminant is very limited in spatial distribution. Please recognize that we may not have the actual knowledge to properly apply the term. In many cases, the proper term to be applied would be "limited soil" as opposed to "hot spot." We will have to use our professional judgement. In other documents, such as the Proposed Plan, since it is a public-oriented document, I prefer that we not use the term "hot spot" at all.
2. Page 2-5, Section 2.2, surface water discussion: "value" should replace "vale."
3. Page 2-6, discussion of RAO 1: the first paragraph, continuing over to page 2-9, should be rewritten to include a better explanation that the sites included in the site-specific direct exposure industrial/commercial SCTL (the proper term) are what were generally termed the "covered landfill" sites. They should not just be termed "disposal sites." You will remember that it was the act of covering the landfills that the Navy believes is the reason for much of the elevated arsenic in the surface soil. You may want to refer to my

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prior comment number three in my earlier letter concerning the Feasibility Study for Site 14, dated August 29, 2000.

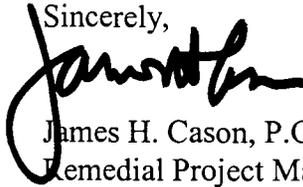
4. Page 3-4, Section 3.2.2, Land Use Controls: this section should be rewritten to reflect the actual stage of Land Use Controls at NASWF. A Memorandum of Agreement (MOA) is in effect. LUCAP is not the proper term to use when discussing a specific MOA. Speaking of the adopted MOA in the future tense (“would be drafted”) should also not be done.
5. Page 3-5, Section 3.2.4, Alternative 4: this is an instance where the use of “hot spot” should not occur. Please substitute “limited soil” in its place. In the second paragraph, I don’t think TRPH is a problem at Site 16. Please confirm that this is the case.
6. In the same paragraph as previously discussed in my initial remarks, please remember that the limited soil removal is recommended to address ecological risks and that additional soil sampling will be done (as has been properly noted in Table 3-2 and in Section 4.3).
7. In Table 3-2, correct all references to the LUCAP. Additionally, I don’t think we should eliminate the possibility of additional soil delineation prior to actual excavation, rather than just specify excavation followed by confirmation.
8. Page 4-4, Section 4.2.1 and Page 4-5, Section 4.2.2: correct the references to the LUCAP or explain that the process has been followed and the MOA (not the LUCAP) for land use controls at NASWF has been signed.
9. Page 4-10, Sections 4.4 and 4.4.1: Substitute “limited soil” for the references to “hot spot.” It appears that in Section 4.4.1, proper delineation and/or confirmation sampling has not been provided for in that composite sampling for confirmation samples are proposed “from the bottom of the open excavation.” I don’t think this is what should be accomplished; rather, the samples should be taken from the sides of the excavation or, preferably, delineated sufficiently prior to excavation such that confirmation samples are not necessary. We can discuss the details, but sampling from the bottom of the open hole is not the way to show proper spatial removal of contaminants.
10. Page 4-11, Section 4.4.2: this section begins to touch on my area of concern that was mentioned at the beginning of my letter, in that we need to begin thinking how we are going to determine when limited soil removal properly addresses the identified ecological concerns at Site 16. We need to carefully consider our actions.
11. Page 5-38: this figure should contain sufficient data to properly correlate the intent; for instance, the data presented do not reflect those locations where cadmium or zinc occur as related to ecological concerns. I recognize that we may not presently have enough data to

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fully depict all the information for this project; however, we should depict as much of the data that we can.

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

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