

N60508.AR.002452  
NAS WHITING FIELD  
5090.3a

LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT FEASIBILITY  
STUDY FOR SITE 14 NAS WHITING FIELD  
8/29/2000  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush  
Governor

# Department of Environmental Protection

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

FILE COPY

48

David B. Struhs  
Secretary

August 29, 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: 14fs1.doc

RE: Draft Feasibility Study for Site 14, Short-Term Sanitary Landfill, Naval Air Station  
Whiting Field, Milton, Florida

Dear Ms. Martin:

I have reviewed the above document dated March 2000 (received March 28, 2000). The Navy should adequately address the following comments before the document can be considered final:

1. Page 1-5, second "bulleted" item: vanadium also exceeded the Florida SCTLs. Vanadium should also be added to the next "bulleted" item.
2. Figure 1-1: in the legend, "RI/FS" is not necessary and should be deleted.
3. Page 2-6, under RAO 1: in the paragraph which begins, "Because Site 14..," please include that fill and cover material obtained at NASWF included subsurface soil which contained elevated arsenic levels. This is the basis for the elevated site-specific commercial/industrial direct exposure SCTL that has been granted. To simply state that Site 14 is a "disposal site" is not an adequate explanation.
4. Page 2-7, second paragraph: delete the last sentence and add to the preceding sentence, "and the MOA."
5. Page 2-10, second bulleted item: delete "post-closure activities" and substitute, "land use controls." Please do not use "LUCs" and further, please consider not using them in most of this document.
6. Page 3-1, second paragraph, second bulleted item: please replace "LUCs" with "land use controls."

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

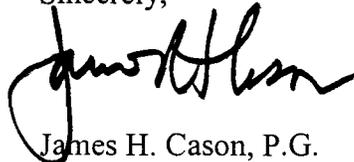
*Printed on recycled paper.*

Ms. Linda Martin  
Page Two  
August 29, 2000

7. Page 4-4 and 4-5, Section 4.2.2 and 4.2.2: please delete all references to "LUCAP," since this is actually the Memorandum of Agreement already in effect. All discussion of the LUCAP should also be deleted since the adopted document is a Memorandum of Agreement and is not referred to as a LUCAP.
8. Page 4-5, first paragraph: delete the remaining words after "considered to be reliable controls."
9. Page 5-2, Section 5.2.2, paragraph three: an explanation of the fact that removal of the top two feet of contaminated surface soil and placing two feet of clean soil cover on the site would still not address the remaining contamination in the subsurface soils. In that situation, if excavation of the two feet of the clean soil cover occurred, it would expose receptors to contaminated soil. Therefore, even though excavation and soil covering were accomplished, land use controls would still be required at Site 14 which address this possibility.

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

Sincerely,



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

cc: Craig Benedickt, EPA Region IV, Atlanta  
Jim Holland, NAS Whiting Field  
Rao Angara, Harding Lawson & Associates, Tallahassee

TJB B JJC JJC ESN ESN