

N60508.AR.002454
NAS WHITING FIELD
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON DRAFT REMEDIAL
INVESTIGATION FOR SITE 16 NAS WHITING FIELD FL
3/30/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

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David B. Struhs
Secretary

CTO-116 RI REP
FILE

Rec'd 4/5/99

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March 30, 1999

Ms. Linda Martin
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, SC 29419-9010

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RE: Draft Remedial Investigation Report, Site 16, Open Disposal and Burning Area, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated January 1999 (received January 6, 1999). The following comments need to be adequately addressed in the final report:

1. All contaminant data should be evaluated using the ground water, surface water and soil GCTLs and SCTLs in Chapter 62-785, F.A.C. Until then, all tables, conclusions and other determinations (especially soil) cannot be adequately reviewed. This comment applies to many tables in the report and in the Appendix. All existing tables should be reviewed for applicability. References to the Soil Cleanup Goals for Florida, 1995 and the associated Applicability of Soil Cleanup Goals for Florida, 1996, should be removed as well as those to the 1994 Ground Water Guidance Concentrations. This is especially important in Section 6.0, Human Health Risk Assessment.
2. Soil contaminants should be evaluated with respect to the leachability criteria in Table II of Chapter 62-785, F.A.C., including assessment of the leachability potential by use of the SPLP procedure in those instances where the default leachability value may be exceeded. If the Navy intends to conduct the actual leaching evaluation from within the Basewide Groundwater Evaluation, it should so state; however, it seems to me that where such an evaluation may be needed, it should be stated in this report to properly document that need.
3. In the manner of Figure 5-7, please present other contaminant data, where they exceed either the Federal or Florida screening numbers, especially for surface soil, on a figure in order that an appraisal can be made of the adequacy of areal contaminant assessment. I am particularly concerned about the areas west of soil samples 16-SL-03, 16S002 and 16S004, in addition to those areas where a high contaminant value is the existing "outer" sampling point.

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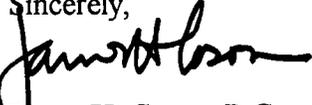
4. Please prepare a table that summarizes the contaminants when they exceed either a Federal or State screening level for each media. I am basically asking for the information presented in the Conclusions, Section 9.1, except in a form that is easily understood and used in evaluating the report and which includes only information where a regulatory level is exceeded. In that regard, I have attached a suggested example for the table.
5. Does the Navy intend to incorporate the background evaluation that is currently being formulated into Section 6.2, where the various soil types are discussed and which were evaluated in the General Information Report? It seems that it may be appropriate to wait for the conclusion of the ongoing background evaluation.
6. Be aware that Chapter 62-777, F.A.C. is currently being promulgated by the Department and could be adopted by late this Spring. When it is, all media cleanup target levels will be represented by the values in that rule. If the final remedy for Site 16 is not in place before that time, we will have to review the values, where different and determine if they affect any conclusions and recommendations that have been made.
7. Figures 6-2 through 6-13: several figures in this group have the risk lines in the wrong place and several give the FDEP Risk Level as a range. Please refer to Figure 6-10, which is correct. Please make the remaining figures the same as it for the risk level and for placement of the heavy line. Please add a "1" at the level of the heavy line on the ordinate of Figure 13.
8. Table 6-12, page 6-47: please make sure the leaching values in the eleventh column are those from Chapter 62-785, F.A.C. or Chapter 62-777, F.A.C., depending on when the final document is submitted.
9. Section 6.8, Summary of Human Health Risk Assessment: the sixth "bullet" discusses the background values of arsenic. Unless those data are presented and discussed in the report, that statement should not be a part of the summary and should be deleted. Additionally, I find it disturbing that the Navy only discusses the presence of PAHs in the context of "other non-site related anthropogenic sources." It would be interesting if the Navy would elaborate on and discuss some of those other sources. The Navy should recognize that, in the absence of a valid reason to believe otherwise, it is likely that waste disposal practices are responsible for the presence of these materials at Site 16, especially since the name of the site is given as an "open disposal and burning area." This is an example of a continuing pattern of downplaying the importance of analytical information. This is reinforced by the statement in the same section regarding beryllium in surface water and the accompanying discussion that apparently is intended to cast doubt on the data in which it states "that this ELCR is based on only one sample." I suggest that the Navy should take additional samples instead of denigrating valid data that it has collected at great cost.
10. Section 7.4.1, page 7-20, Section 7.4.4, page 7-27, Section 7.6.4, page 7-35 and Section 9.1, page 9-5: the use of a 10-fold attenuation factor to evaluate risks to aquatic receptors

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is not entirely valid. The Navy should also present an evaluation of undiluted ground water to aquatic receptors as a realistic "worst case" scenario. This should not come as a surprise, since the State of Florida has been consistent in not allowing dilution factors to be a part of surface water evaluations.

11. Section 7.6.4, page 7-38, last paragraph: the discussion regarding salmonid fish species is questionable in that no data are presented to show that they "do not occur in Clear Creek downstream of Site 16." It could be postulated, using Navy data, that they do not occur downstream of Site 16 *because* of the discharge of high iron content ground water. Irrespective, the point is that if the discharge is high in iron, it is, *ipso facto*, something which should be addressed on a rational basis by the Navy.
12. References: please update the FDEP references to reflect the newer and current regulations and guidance documents.

Although these comments are few in number, they will necessitate considerable rewrite of the document and changes in many of the tables. In effect, a new report will be produced. I request that the Navy incorporate the changes with respect to the Florida-based content prior to submitting any future reports since they cannot be adequately reviewed in the absence of the newer information. If you have questions or require further clarification, please do not hesitate to contact me at (904) 921-4230.

Sincerely,

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

Attachment (1)

cc: Craig Benedikt, USEPA Atlanta
Rao Angara, Harding, Lawson and Associates, Tallahassee

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EXAMPLE
Media Contaminant Exceedances
Site 16
NAS Whiting Field

	Soil			Ground Water	
	Federal	Florida Class I	Florida Class II	Federal	Florida
Human Health					
Arsenic	X	X		X	
Beryllium		X			
BAP	X	X	X		
Iron		X			X
Ecological					
Arsenic	X				