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NAS KEY WEST
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LETTER REGARDING U S EPA REGION IV VERBAL APPROVAL OF SAMPLING OF
ADDITIONAL SITES FOR SUPPLEMENTAL RESOURCE CONSERVATION AND RECOVERY
ACT FACILITY INVESTIGATION NAS KEY WEST FL
8/21/1996
BROWN AND ROOT ENVIRONMENTAL



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OC

Ms. Martha Berry
U.S. Environmental Protection Agency, Region IV
Waste Management Division, Federal Facilities Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

REC'D AUG 26 1996

SUBJECT: Naval Air Station (NAS) Key West, FL
Supplemental RCRA Facility Investigation (RFI)
and Remedial Investigation (RI)

Dear Martha:

As we discussed in a telephone conference on July 8, 1996, the below issues have received your verbal regulatory approval. These items relate to the sampling of additional sites that is currently being conducted at the eight sites of the approved supplemental RFI/RI Work Plan (ABB December 1995) that have not yet been investigated and the background sites on and around Key West. Most of these items eliminate sampling that is either unnecessary or will not produce results needed to determine necessary corrective action.

- We propose to analyze biota samples for metals and pesticides but not for volatiles and semi-volatiles. In biota analyses from Boca Chica conducted in January-February 1996, only three semivolatiles [phenol, bis(2-ethyl hexyl)phthalate, and pyridine] were detected. No volatiles were detected in biota samples.
- We propose not to perform terrestrial or aquatic toxicity testing as a part of ecological risk sampling and analysis. This testing was performed on Boca Chica samples taken in January-February 1996, and the results were inconclusive and did not add meaningful evidence for evaluating eco risk but rather the opposite.
- We propose not to collect and analyze surface water samples from the open ocean at IR-1 (seven locations), IR-7 (ten locations) and IR-8 (10 locations) as provided in the sampling and analysis plan (SAP). It is not believed that samples of open ocean water, even if adjacent to these sites, will add any useful evidence for conclusion of risk or contaminant migration.
- At IR-1, the SAP shows two new monitoring wells upgradient but the text lists five. We propose two; however, we intend to move them to be more upgradient to the northwest of the site.

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- At IR-3, the four off-site surface soil samples to the north of the site will be omitted due to previous sampling which confirmed that there is no contamination off-site north of Fort Street. The two soil sampling sites south east of the site will be sampled from 0-6" and 6"-2' (the SAP specifies the depth of 0-1 foot but also says surface and subsurface).
- At SWMU-4, the surface soil samples are stated to be for background and therefore should be moved to the west to be certain they are uncontaminated (one site is shown to be next to an excavated UST).
- At SWMU-5, two sediment and surface water samples (S5SS-3 and S5SS-4) will be moved from the concrete ditch (where no sediment exists to sample) to the soil channel and pond downgradient of the site.
- At AOC-B, the three new temporary monitoring wells to be installed will be permanent wells to allow for future sampling as necessary.

Should you have any questions, please contact me at 803-649-7963.

Sincerely,



Kevin J. Walter, P.E.
Project Manager CTO 0007
Naval Air Station Key West

KJW:psm

Enclosure

cc: Jorge Caspary, FDEP
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File 1.1.1