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NAS KEY WEST
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LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS TRUMBO POINT
REPORT NAS KEY WEST
9/17/1985
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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ATLANTA, GEORGIA 30365

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LCDR. L.V. Marchette
Department of the Navy
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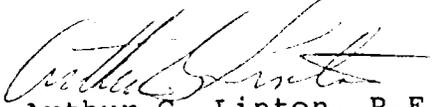
Dear Sir:

We have reviewed the Geraghty and Miller report on Trumbo Point Annex, NAS Key West, and offer the following comments:

1. The report describes a subjective examination, visual and olfactory, of samples removed from fourteen solid stem auger borings for the presence of hydrocarbons, however it fails to state the examiner's findings. The report also describes the detection of a floating hydrocarbon layer in two of ten monitoring wells installed at Trumbo Point. Based on the historical reports of past hydrocarbon leaks, the uncertainties of the subjective inspection of borings for hydrocarbons, and the reported finding of hydrocarbons in the monitoring wells, it is reasonable to conclude that some contamination of the superficial aquifer exists at Trumbo Point.
2. The U.S. Environmental Protection Agency (EPA) concurs in the recommendation that additional borings and groundwater sampling are needed to define the extent and nature of groundwater contamination at Trumbo Point. In addition to follow-up analysis for total dissolved solids and measurement of hydrocarbon layer thickness, the Navy may consider a more detailed analytical program. EPA favors the use of specific analyses for priority pollutants in confirming presence or absence of contamination rather than reliance on general indicator parameters or measurements which may lack sensitivity. EPA would suggest that if funding permits, at the minimum a composite sample of shallow groundwater be analysed for the 123 priority pollutant list.
3. Given the complexities of shallow groundwater movements in permeable zones subjected to tidal action, it may be difficult to evaluate background water quality, however such determination should be attempted in order to evaluate any degradation. The report does not address this.

The U.S. Environmental Protection Agency appreciates the opportunity to provide this additional input to the Navy in addressing the environmental conditions at NAS Key West. Inquiries may be directed to either Arthur G. Linton, Regional Federal Facilities Coordinator at (404) 881-3776 or Wayne Mathis, CERCLA Federal Facilities Coordinator at (404) 881-2643.

Sincerely yours,,



Arthur G. Linton, P.E.
Regional Federal Facilities Coordinator
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cc: D.R. Spell, NFEC