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NAS KEY WEST  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON INITIAL ASSESSMENT STUDY  
NAS KEY WEST  
8/26/1985  
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

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AUG 26 1985

4PM-EA/AGL

Commander C.J. Fehlig  
Public Works Officer  
Department of the Navy  
Naval Air Station  
Key West, Florida 33040

ATTENTION: Ensign Joe Avoilis

SUBJECT: NACIP - Initial Assessment Study

Dear Sir:

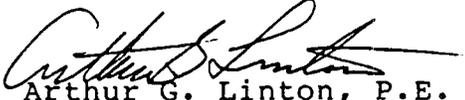
This office has reviewed the May 1985, Initial Assessment Study of Naval Air Station, Key West, Florida conducted pursuant to the NACIP and CERCLA.

The following comments are offered for your consideration:

1. The selection of potential release sites for follow-up investigation appears to be well documented and supportable.
2. Given the complexity of shallow groundwater movements in a highly permeable zone subjected to tidal influences and frequent precipitation, it may be difficult to evaluate background groundwater quality. The recommendations do not address locations where groundwater background quality may be measured.
3. The Environmental Protection Agency (EPA) favors the use of specific analyses for priority pollutants to determine presence or absence of releases, as contrasted with reliance on general indicator parameters which may lack sensitivity. The Navy's proposal involves specific analysis for constituents known to have been disposed of, and is consistent with this approach. The parameters selected appear to be representative of the expected composition of contaminant plumes, and are appropriate. We would suggest that unless incremental survey costs are prohibitive, the Navy consider analysis of an additional composite sample downgradient from each site for all 123 priority pollutants.

USEPA appreciates the opportunity to provide input to the Navy in implementing the Navy Assessment and Control of Installation Pollutants Program.

Sincerely yours,



Arthur G. Linton, P.E.  
Federal Facilities Coordinator  
Office of Policy and Management

cc: Mr. D.R. Spell, Naval Facilities Engineering Command  
Mr. Eric Nuzie, Florida Department of Environmental Regulation