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NAS KEY WEST
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LETTER OF TRANSMITTAL AND U S NAVY RESPONSES TO RESTORATION ADVISORY
BOARD COMMUNITY MEMBER COMMENTS ON NO FURTHER ACTION DOCUMENT FOR
SITE 2 AND SITE 6 NAS KEY WEST FL
1/27/1997
NAS KEY WEST

5090

Ser 1883PW/0102

27 Jan 97

Ms. Robin Orlandi
NAS Key West Restoration
Advisory Board (RAB)
PO Box 430
Key West, FL 33041

Dear Ms. Orlandi:

We at the Naval Air Station appreciate your interest in our cleanup effort and welcome the chance to provide answers to your questions on the "No Further Action" (NFA) document for IR-2 and IR-6. A draft of this document was submitted to state and federal regulators on January 7, 1997 for comments. Responses to your questions are enclosed and by copy of this letter are being sent to all other RAB members and to regulators.

I hope these responses adequately answer or address your concerns. If you have additional questions or would like to discuss any of these issues further, please feel free to call me at (305)293-2194 or the Navy's Remedial Project Manager, Mr. Dudley Patrick, at (803)820-5541. We will also be available at the January 27, 1997 RAB meeting to answer any questions you may have.

Sincerely,

R. A. DEMES
Engineering Director
Public Works Department
By direction of
the Commanding Officer

Encl:

(1) NFA Document Questions

Copy to:

| | |
|-----------------------------------|--|
| Martha Berry, EPA IV | Mimi Stafford, Community RAB Member |
| Jorge Caspary, FDEP, Tallahassee | |
| Dudley Patrick, SOUTHNAVFACENGCO | Dent Pierce, Community RAB Member |
| Susan Loder, Community RAB Member | |
| Jim Smith, Community RAB Member | → Chuck Byran, Brown & Root Environmental |

Robin Orlandi
Community RAB Member

Comment Responses
Dated: November 1996

Comment 1:

Insufficient information has been provided concerning this site. Under "Findings," a reference is made to "the Sampling and Analysis section of this report." This is not included in the working draft we received. I assume that it is part of the 1987 Geraghty and Miller report. Is a copy of the 1987 report available for review by RAB members?

Response: The NFA document letter is not a stand-alone document. Additional information on IR-2 is available in the "Verification Study of Potential Ground-Water Pollution at the Naval Air Station Key West, Florida" prepared by Geraghty & Miller, 1987. This report is part of the administrative record and should be available to the public at the Monroe County library.

Comment 2:

What kind of soil contaminant testing was performed? Were direct soil as well as leachate tests performed? Why were composite samples used instead of individual sample testing as has been performed at other IR sites?

Response: The types of sampling performed at IR-2 are documented in the 1987 Geraghty & Miller Report.

Comment 3

There are conflicts between the data provided and the conclusions drawn in the working draft: Table 3 reports concentrations of total PCBs in soil samples to a depth of 1 ft. from all six plots ranging from .308 to 4.2 parts per million or mg/kg. In section 3.0, "Conclusions," the draft states "only very low levels of PCBs were detected near or beneath the applicable screening action level of 576 ug/kg (Florida Dept. of Environmental Protection General Worker Soil Cleanup Goals for Aroclor 1260)". But ug/kg is equal to parts per billion. If the levels of PCBs measured at a depth of 1 foot at IR-2 are converted to parts per billion, the range becomes 308 to 4200 ppb. All but one sample exceeds (by as much as 7x) the FDEP general worker soil cleanup goals. Residential Remediation Goals from table 2-3 of the *Draft Supplemental RCRA Facility Investigation/Remedial Investigation* are even lower at 83 ppb. Are the soil contamination measurements in table 3 correctly stated as parts per million? If so, how can this site be characterized as requiring "No Further Action?"

Response: The "Conclusions" section will be modified to state that 17 of 18 samples were below the FDEP screening action level of 3.5 mg/kg. It will also recommend that any additional

investigations be performed at IR-2 as part of the site inspection for BRAC Site No. GRYZNC. Thus, no further action is required for IR-2 because it will be incorporated into the BRAC SI.

Comment 4:

Also in Section 3.0, "Conclusions," the Working Draft Decision Document Letter Report states "Since the sampling in 1986, these low levels of PCBs are believed to have further been environmentally degraded and lowered due to natural attenuation and biological reduction." Was the soil evaluated, as it was at SWMU 1, for its total organic carbon and ability to attenuate contaminants? It is my understanding that while PCBs break down through photodegradation, they are relatively stable in under ground soils. If the ppm contaminant measurements in the Working Draft Document are correct and the 1986 PCB levels actually exceeded the FDEP cleanup goals, it would seem appropriate to re-test the soil at the site before finalizing a "No Further Action" Decision. If additional testing has been done, what document contains the results?

Response: The sentence will be deleted and the "Conclusions" section will be modified as described in Response 3.

Comment 5:

Is IR-2 included among the Navy properties to be excessed under BRAC?

Response: Yes. See Response 3.