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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON COMPREHENSIVE BACKGROUND REPORT MODIFICATION 1 NAS KEY
WEST FL
5/12/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



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Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

May 12, 1997

Mr. Dudley Patrick, Code 1858
Southern Division
Naval Facilities Engineering Command
P. O. Box 190010
N. Charleston, South Carolina 29419-9010

RE: Comprehensive Background Report Mod. 01. Naval Air
Station Key West, Florida

Dear Mr. Patrick:

I have reviewed the above referenced document dated March 27, 1997 (received March 28, 1997) and have the following comments:

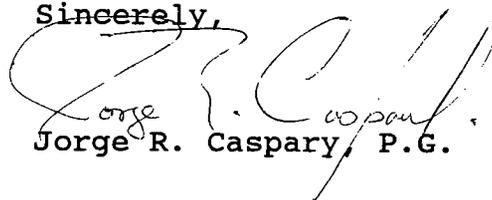
1. The report attempts to develop background levels for a series of constituents and in doing so, goes over a vast data base dating back to 1986. Since there are questions with regards to the quality of some of the data, perhaps it would have been a better approach to only utilize data that meets strict quality assurance /quality control checks. This could provide a more precise determination of background conditions at the site.
2. The large standard deviation of some constituents may render the values unacceptable from a statistical perspective. A suggestion would be to consider the frequency of detection as a parameter designed to reduce the large standard deviation. Frequency of detection is widely used in Baseline Risk Assessments and its consideration in this report is highly recommended.
3. Depending on the concentration detected, unusually high numbers may be indicative of a release and not necessarily be attributed to sampling and analytical errors. Please specify which constituents does the fourth paragraph of page 2-8 is referring to.

I look forward to discussing these comments at our May 19-21 partnering meeting.

Mr. Dudley Patrick
May 12, 1997
Page Two

If I can be of any assistance in this matter, please contact me at 904/488-3935.

Sincerely,



Jorge R. Caspary, P.G.

cc: Ron Demes, NAS Key West
Martha Berry, EPA-Atlanta
Charles Bryan, Brown & Root -Aiken

TJB  JJC  ESN 

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