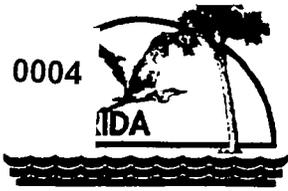


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LETTER OF TRANSMITTAL AND FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION COMMENTS ON SITE INVESTIGATION WORK PLAN FOR TEN BASE
REALIGNMENT AND CLOSURE SITES NAS KEY WEST FL
12/10/1997
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

0004



Department of Environmental Protection

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7593-31-005

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 10, 1997

Mr. Dudley Patrick, Code 5541
SOUTHDIV
P.O. Box 190010
N. Charleston, SC 29419-9010

RE: Site Investigation Workplan for Ten BRAC Sites.
Naval Air Station Key West, Florida

Dear Mr. Patrick:

Department personnel have reviewed the above referenced document dated November 1997 (received November 7, 1997). I am attaching a memorandum addressed to me from Mr. David Grabka. The concerns detailed in Mr. Grabka's memorandum need to be addressed in the preparation phase of the BRAC Investigation Report.

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

Sincerely,



Jorge R. Caspary, P.G.

cc: Charles Bryan, Brown & Root-Aiken
Martha Berry, EPA-Atlanta
Roy Hoekstra, Bechtel-Oak Ridge
Ron Demes, NAS Key West

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Memorandum

Florida Department of Environmental Protection

TO: Jorge Caspary, P.G. II, Remedial Project Manager

THROUGH: Tim Bahr, P.G. Supervisor, Technical Review Section *TB*

FROM: David P. Grabka, E.S. I, Technical Review Section *DPG*

DATE: December 4, 1997

SUBJECT: Site Investigation Workplan for Ten BRAC Sites, Naval Air Station Key West, November 1997

I have completed my review of the Site Investigation Workplan for Ten BRAC Sites at Naval Air Station Key West, prepared and submitted by Brown & Root Environmental. I have no comments concerning the physical scope of work to be performed (soil borings, monitoring well installation and sampling, surface water and sediment sampling). However, I do have comments concerning the action levels listed in Appendix B, Data Quality Objective Process Documentation:

- (1) Greater care needs to be taken in the generation of action levels. DEP criteria should be used unless a relevant U.S. EPA standard or guidance level is more conservative.
- (2) Sediment Action Levels.
 - (a) DEP Industrial Soil Cleanup goals and U.S. EPA Residential Soil RBCs should not be used as action levels for sediment. They are not protective of aquatic organisms which are the basis for sediment quality guidelines. If sediment quality guidelines for a contaminant do not exist, an action level should not be applied.
 - (b) Sediment quality guidelines for pesticides should be used.
 - (c) The basis for some of the sediment action levels is obscure. An effort should be made to determine if the numbers are truly applicable to the Florida Keys environment. For example, it is believed that the Ontario Guidelines were developed to assess sediment quality in the Great Lakes region, a region that is not truly comparable to the Florida Keys.
- (3) Soil Action Levels. The Department has generated new risk based soil cleanup target levels. These numbers have been developed for use in a rule under development, Chapter 62-785, Florida Administrative Code. These numbers should be used as action levels for soil.

MEMORANDUM
Site Investigation Workplan
Ten BRAC Sites, NAS Key West
Page Two
December 4, 1997

- (4) Groundwater Action Levels. The Department's Groundwater Guidance Concentrations should be used in place of the U.S. EPA Tap Water RBCs where they are lower.

- (5) Surface Water Action Levels.
 - (a) Sodium should be dropped.

 - (b) U.S. EPA Tap Water RBCs are not applicable to surface waters.

 - (c) Please note that surface water quality criteria has also been incorporated into the proposed rule, Chapter 62-785, F.A.C.