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LETTER AND U S NAVY RESPONSES TO U S DEPARTMENT OF THE INTERIOR
COMMENTS FOR SUPPLEMENTAL RFI LETTER REPORT ADDENDUM SITE 11 NSB KINGS
BAY GA
10/23/1997
ABB ENVIRONMENTAL SERVICES, INC



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October 23, 1997

Mr. Chris Leeth
U.S. Department of Interior
Geological Survey
Water Resources Division
Peachtree Business Center, Suite 130
3039 Amwiler Road
Atlanta, Georgia 30360-2824

Subject: Response to USGS Comments dated 10/21/97 for the Supplemental RFI Letter Report Addendum, Site 11, Naval Submarine Base, Kings Bay, Georgia

Dear Mr. Leeth:

Thank you for assisting ABB-ES in developing a summary report for the 1997 groundwater investigations. I appreciate your professionalism and technical expertise in reviewing the October 10, 1997, Supplemental RFI letter report addendum. As I understand ABB-ES' position, the October 10, 1997, document that you reviewed is being replaced with a new document to incorporate additional groundwater chemical data. Since most of the October 10 document is being incorporated into the new document, your recent effort to provide comments remains helpful. Following are responses to your comments issued in your letter dated October 21, 1997, to Ms. Laura Harris of ABB-ES.

Comment regarding page 2, paragraph 4. The text will be revised as to add the following:

Flow velocities cited are Darcy velocities and do not account for the porosity of the matrix. The USGS did not offer an estimate of the average horizontal velocity, or speed at which a particle would move through a given sediment over a given period of time, because there is no site-specific effective porosity data. One could use porosity values from the literature to derive an average horizontal velocity by dividing the Darcy velocity by the porosity.

Comment regarding page 2, paragraph 5. Summary, or "hits" tables will be added. The hits tables will have dashes where values are nondetect so that the numbers for the detected concentrations will be more readily viewed. The hits tables, however, will reside in Attachment B in accordance with Navy CLEAN program document format requirements. Individual hits tables are being developed for the information summarized in existing Table 1 of the document, the 3/97 direct push, 3/97 wells and piezometers, 9/97 direct push, and 9/97 wells.

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Mr. Chris Leeth
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Note: Regarding the comprehensive data tables printed from GIS Key, I am unclear as to whether you think those are needed. I plan to remove the comprehensive tables for the January - September 1994 and April 1995 sample events, from the report (a reference to the draft final SRFI report will be on the hits table to indicate where the information was taken from). GIS Key tables will only be attached for the 1997 measurements (so that detection limits and dilutions can be observed if wanted).

Comment on Figure 3. Data boxes will be added to the figure.

Response related to inclusion of "Cottage Court and SCAPS data". The 3/97 (SCAPS) and all 9/97 data will be included. Figures will be added that have data boxes on them at sample locations. Hits tables will also be added. The direct push data will be presented on separate figures and tables from wells and piezometers.

I would like to clarify the issue identified by your perception of EPD's and D.W. Hicks concern of omission of data. ABB-ES' preliminary submission of the direct push data to the Navy was requested two weeks in advance of our intended delivery date. As such, ABB-ES only provided the data addressing delineation as requested by the Navy. At the direction of the Navy, the remaining data would not be provided to the EPD until the Navy had an opportunity to review it. ABB-ES provided the data to the Navy on October 10, 1997, and presented it to the EPD during a meeting on October 14, 1997. Our discernment of EPD's concerns is that the preliminary release of additional direct push data to the EPD without the Navy team review and consent has lead to the misperception that data were being withheld. There was no intent to misrepresent or omit the data, as all of the data was not collected to support delineation. However, as previously discussed and agreed to, all of the direct push data will be included in the upcoming letter report summarizing the 1997 focused groundwater investigations.

If the responses contained herein do not appear to adequately address all of your comments, please contact me at your earliest convenience.

Sincerely,

ABB ENVIRONMENTAL SERVICES, INC.



Mr. William M. Kaschak, P.E.
Task Order Manager

[08503.087]

pc: A. Robinson, SOUTHNAVFACENCOM
R. Bath, NSB