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June 6, 1995

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B. K. Morin
Code 1855
Department of the Navy
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

Re: Final Draft Resource Conservation and Recovery Act (RCRA) Facility Investigation, CSS Panama City, Florida, January, 1995

Dear Mr. Morin:

We received a copy of Volume I of the above referenced document on 4/27/95 from David Clowes of our department's Bureau of Waste Cleanup. We were never submitted a copy of this document by your office or the contractor for review and comment. In the future, please submit directly to us a copy of any documents and inform us of any meetings related to remedial activities at CSS Panama City. We regret our comments being late due to this oversight.

1. Table 6-8 (Summary of Analytical Data Screening for the RFI), p. 6-17, indicates ecological assessment for screening of sediment will only be based on the USEPA Region IV sediment screening values (SSVs). In addition, any constituent which does not have an SSV should be screened based on twice the reference (background) value as is done for soil.

2. Table 7-4 (Analytes Detected in Surface Soil Background Samples), p.7-25, indicates relatively high values for the pesticides 4,4-DDD, 4,4-DDE, 4,4-DDT and Dieldrin. The soil guidance cleanup goals were exceeded for the maximum concentration detected for 4,4 DDT and Dieldrin. We agree that these detections are likely due to overall basewide use of pesticides. However, these values would be of extreme concern if soils were near or adjacent to a surface water body. The lowest sediment effects values are 3800 times lower for 4,4-DDT and 425,000 times lower for dieldrin based on the maximum detected concentration for these pesticides. These reference values should not be considered when a site is near

or adjacent to a surface water body or wetland due to the likely migration of soil from storm water runoff.

3. To enhance review time, all analytical tables and summary tables in the document related to each medium should include the promulgated standards or any guidance values (e.g. soil guidance values; groundwater standards and guidance values; surface water standards; sediment SSVs).

4. Sections 8.1.7.2 (Surface Water Inorganic Analytical Results - SWMU 1), p. 8-47, should be evaluated based on Florida Surface Water Quality Standards (FSWQS) as well as surface water background concentrations. The FSWQS for copper (2.9 µg/L) was exceeded at all sampling stations except SW04, SW07, and SW08; lead (5.6 µg/L) was exceeded at SW01, SW02, and SW05; and mercury (.025 µg/L) was exceeded at SW07.

5. Section 8.1.8.2 (Sediment Inorganic Analytical Results and Interpretation - SWMU 1), p. 8-58, compared the analytical results to groundwater background concentrations. Comparison should be made to SSVs or sediment background. Constituents which exceeded their SSV at more then one sampling station were: benzo(a)anthracene, chrysene,dibenz(a,h)anthracene, fluoranthene, Aroclor 1254, and copper. Several other PAHs and inorganics exceeded more then twice their background concentration.

6. Section 8.1.9 (Site Assessment Summary - SWMU 1), p. 8-59 discusses the high PAH Levels detected in subsurface soil at the south dock as likely related to the free product area. This section should also indicate that the extremely high PAH values detected in sediment at sampling stations SW01, SW02, and SW03 are likely due to the seeping of free product from the bulkhead at the South Dock.

7. Section 8.9.6.2 (Groundwater Inorganic Analytical Results and Interpretation - AOC 1), p. 8-310 discusses high inorganic concentrations in monitoring wells PCY-13-2D and PCY-13-7I which are upgradient of the source area. The source of these inorganic constituents needs to be determined.

8. Section 10.2.1.1 (Surface Water - SWMU 1), p. 10-28, reference the "State of Florida Surface Water Quality Screening Values." These are not screening values, but promulgated standards. The words "Screening Values" should be changed to Standards.

9. Section 10.2.4.1 (Surface Water Risk Characterization -

SWMU 1 and AOC 2), p 10-65, uses surface water standards for simple linear regressions related to the benthic community metrics. We are unsure of the purpose of this exercise. Effects to the benthic community is related to contamination in the sediment which is affected by the water quality and vice versa. However, FSWQS are based upon likely effects to organisms within the surface water, not the sediment. The FSWQS should be the basis for risk characterization.

10. Section 10.2.4.2 (Sediment Risk Characterization - SWMU 1 and AOC 2). p. 10-63, risks were associated with contaminated sediment, specifically at sampling stations SD01, SD02, SD03, and SD06, based primarily are high PAH values, but that these impacts are not likely related to SWMU 1 or AOC 2. However, Stations SD01, SD02, and SD03 are likely affected by the release of PAH constituents detected in the free product area at the South Dock. Free product has been observed seeping through the bulkhead into the bayou at this location. This should be indicated in the risk characterization.

11. Section 10.3.4.2 (Surface Water Risk Characterization - SWMU 2), p. 10-110, indicates aquatic receptors may be at risk from inorganic contamination. Further sampling may be needed downgradient to adequately determine the extent of contaminant migration.

This section further states (p. 10-114) that cadmium, mercury, silver, and nickel are likely not related to SWMU 2 as they were not detected in the sediment. Very few of the ecological chemicals of special concern (ECPC) in surface water were not detected in sediment, and those which were detected rarely exceeded their SSV. The low pH of the water likely makes any inorganics in the sediment soluble or causing the metals to leach from the sediment.

12. Table 10-37 (Selection of Ecological Contaminants of Potential Concern - SWMU 3), p. 1-123 uses the USEPA Region IV SSVs for comparison. We recommend also using threatened effects level from FDEP's Sediment Quality Assessment Guidelines (SQAGs)(MacDonald, 1994) for any sediment within a marine environment. All the SQAGs were determined based on research data in a marine environment. The Region IV SSVs defaulted to the Contract Lab Protocols - Practical Quantitation Limits (CLP-PQL). However, when there are exceedences or detections at or above these levels, the screening value should be based on the SQAGs. In a freshwater environment, the Effects Range Low (ER-L) value established by NOAA should be used for screening.

13. Section 10.4.4.1 (Surface Water Risk Characterization - SWMU 3), p. 10-141, discusses the simple linear regressions related to surface water ECPC. Refer to comment #9.

14. Section 10.4.4.2 (Sediment Risk Characterization - SWMU 3), p. 10-141, indicates using the states PEL values as reference. The reference should be to the TELs which is similar to the NOAA ER-L value.

Should you need any further information, please contact me at (904)487-2231.

Sincerely,

John W. Mitchell
Natural Resource Trustee Project
Manager, Office of
Intergovernmental Programs

cc: Pat Kingcade, FDEP
Eric Nuzie, FDEP
John Lindsey, NOAA
Craig Brown, USEPA
Steve Watson, ABB

Reference

MacDonald, D.D.. 1994. *Approach to the Assessment of Sediment Quality in Florida Coastal Waters, Volume 1 - Development and Evaluation of Sediment Quality Guidelines.* Florida Department of Environmental Regulation, Tallahassee, FL. 126pp.