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NAS WHITING FIELD
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LETTER REGARDING U S NAVY RESPONSE TO FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION AND U S EPA REGION IV COMMENTS SITES 5A, 7, 29,
35, 38, POTENTIAL SOURCE OF CONTAMINATION 1485C DRAFT REMEDIAL
INVESTIGATION NAS WHITING FIELD FL
12/1/2002
TETRA TECH NUS

**RESPONSE TO FDEP AND USEPA COMMENTS
ON DRAFT REMEDIAL INVESTIGATION REPORT FOR
SITES 05, 07, 29, 35, and 38**

GENERAL NOTE:

At the November 19-20, 2002 NAS Whiting Field Partnering Team meeting it was decided to re-label this report as a Remedial Investigation Report for Sites 05A, 07, 29, 35, 38, and PSC1485C. The comments received from the FDEP were made on a Preliminary Assessment/Site Investigation report prior to this decision. The comments will be addressed with regards to a Remedial Investigation, as opposed to a Preliminary Assessment / Site Investigation.

RESPONSE TO FDEP COMMENTS:

Site 05A - The Battery Acid Seepage Pit

Comment 1 *This site is unusual because the original PA/SI was completed in the early 1990s and the site was granted NFA status. An additional PA/SI was also completed in January 2002. The present investigation represents the results of additional investigations to address possible PCB and pesticide contamination at the site. Including some historical information on this site will help keep the administrative record more straightforward; otherwise, a reader of the present document may question why the "Battery Acid Seepage pit" site at which the battery acid material was discharged on the west side of the building was subjected to soil sampling only on the East side of Building 1478.*

Response

Sections 1.2.2.1 and 1.2.3.1 in the RI contain a discussion of the site description and history and previous investigations for Site 05. Section 1.2.2.1 specifically details that Site 5, Building 1478, was initially the Transformer Repair Building from the 1940s to the 1960s when it began being used as the Battery Shop until 1984. Section 1.2.3.1 details that the previous investigations were focused on contaminants consistent with a battery shop and subsequent discharges from battery shop to the dry well located on the west side of the building. Section 1.2.3.1 also explains that the Site was closed following the investigation for contaminants associated with battery operations at Building 1478. Additionally detailed in section 1.2.3.1 is the collective realization that the Navy, USEPA, and FDEP had overlooked the possibility of PCB soil contamination associated with Building 1478 being previously used as the Transformer Repair Building. Thus Site 05 was being investigated for PCB contamination. The reason from

collecting soil borings from the east side of the building is addressed in the response to Comment 2.

Comment 2 *Please indicate why soil borings were collected only on the East side of the building.*

Response

The soil assessment was conducted on the East side of Building 1478, the area where transformer fluid was most likely emptied. This area was identified based on the location of a doorway and covered porch on the East side of Building 1478. The doorway and covered porch would have provided individuals with the most accommodating outside work area. Additionally, transformers were reported to be drained of dielectric fluid and discharged to the grassy ditch located southeast of Building 1478,

Comment 3 *Please resolve the discrepancy in Section 1.2.2.1 and 2.2 regarding the location of battery acid discharge activities (similar to comment 1., above)..*

Response

Sections 1.2.2.1 and 2.2 have been clarified to state that battery acid discharge activities occurred in the dry well located west of the building, but dielectric fluid from transformers was discharged into the grassed ditch located southeast of the building.

Comment 4 *Similar to my prior comment for the Site Investigation, please justify why groundwater sampling was not accomplished at the site. I am aware that 'soil leaching will be addressed in the Site 40 and 39 RI report.' What about the groundwater contaminant regime at this site. Groundwater contamination and leaching are not necessarily the same thing, unless it has been determined to be so.*

Response

Groundwater was previously investigated during the initial investigation of Site 05. During the initial investigation, the groundwater was analyzed for a full suite of possible contaminants including PCBs. Since PCBs were not detected during the initial investigation, there was no need to further investigate the groundwater associated with Site 05.

Comment 5 *Section 2.2.4: iron has not formally been determined to be naturally occurring at NASWF. This is something we need to address.*

Response

Subsequent to this comment by FDEP, it has been determined that elevated concentrations of several metals, including: aluminum, arsenic, iron, manganese, and vanadium, are most likely naturally occurring, unless the elevated concentrations can be associated with previous or current site activities.

Comment 6 *Vanadium exceeds the current Florida SCTL. Until such time that it is revised, this constituent must be addressed.*

Response

All references to the Florida SCTL being too conservative for Vanadium have been removed. However, as stated in the response to Comment 5, elevated concentrations of vanadium have been determined to be unrelated to site activities. The text in the report has been modified to include this determination.

Site 07 – The South Avgas Tank Sludge Disposal Area

Comment 1 *We have formally discussed this site with regard to petroleum-based contamination and cleanup and a Focused Feasibility Study is recommended; I concur, if all contaminants including inorganic contaminants, are properly addressed.*

Response

Elevated levels of arsenic and vanadium have been determined to be unrelated to site activities. Therefore the only contaminants to address are PAHs in the surface and subsurface soil.

Site 29 – Auto Hobby Shop

Comment 1 *Vanadium exceeds the current Florida SCTL. Until such time that it is revised, this constituent must be adequately addressed..*

Response

Please refer to the response to Comment 6 for Site 05.

Site 35 – Building 1429: Public Works Maintenance Facility

Comment 1 *I concur with the development of a Focused Feasibility Study. My prior comments regarding Vanadium apply to this site also.*

Response

Comment is noted. Please refer to the response to Comment 6 for Site 05 with regards to vanadium.

Site 38 – Building 2877, Former Golf Course Maintenance Building

Comment 1 *I concur with the development of a Focused Feasibility Study. My prior comments regarding Vanadium apply to this site also.*

Response

Comment is noted. Please refer to the response to Comment 6 for Site 05 with regards to vanadium.

PSC 1485C – Pesticide Storage Building

Comment 1 *I concur with the development of a Focused Feasibility Study. My prior comments regarding Vanadium apply to his site also..*

Response

Comment is noted; however, since this comment was submitted by FDEP, PSC 1485C has been redesignated as Site 41. Site 41 will be investigated separately and the investigative results presented in a separate document. All references to PSC 1485C have been removed.

RESPONSE TO USEPA COMMENTS:**General Comments:**

Comment 3 *In a number of locations throughout the document, the statement is made that regulatory limits are too conservative. These statements merit additional explanation or should be removed from the document.*

Response

With regards to the HHRA, refer to the response to FDEP Comment 1 for Site 5A, The Battery Acid Seepage Pit. Reasoning for using alternative limits for the ERA is contained in Appendix A of the Report.

USEPA Response *I do not believe the response to FDEP's comment applies in this case. Therefore, I would prefer all statement suggesting regulatory limits are too conservative be removed.*

Response

All statements suggesting regulatory limits are too conservative have been removed.

Specific Comments:

Comment 3 *Page ES-1, Executive Summary.* *The first and second sentences of the third paragraph should be reworded for clarify.*

Response

The first and second sentences of the third paragraph will be reworded as follows:

Site 05 was previously investigated and closed, however; Site 05 was not investigated for possible pesticide/PCB contamination. Therefore, the pesticide/PCB contamination investigation at Site 05 was conducted as Site 5A. Four (4) surface soil borings and four (4) subsurface soil borings were advanced using DPT at Site 5A.

USEPA Response *It does not matter that Site 5 was previously closed. Sites can be reopened based on new information. Therefore, the current investigation of the site should be addressed as Site 5 and not as Site 5A.*

Response

References to Site 5A have been replaced with Site 05, and an explanation of the need for further investigation at Site 05 has been included in Section 1.2.2.1 and 1.2.3.1.

Comment 4 *Page ES-2, Executive Summary.* *In the first paragraph on this page and elsewhere in the document, “Region IX RAGs” should be changed to “Region IV RAGs”. In the second paragraph and elsewhere in the document, “USEPA Region IV PRGR” should be changed to “USEPA Region IX PRGs”.*

Response

References to “Region IX RAGs” and “USEPA Region IV PRGR” will be changed to read “Region IV RAGs” and “USEPA Region IX PRGR.”

USEPA Response *The reference should be changed to Region IV RAGS and USEPA Region IX PRGs. The response still does not address the requested correction for the Region IX PRGs.*

Response

References to "Region IX PRGR" have been corrected to read, "Region IX PRGs"

Comment 8 Page 1-15, Section 1.2.3.3. *The first sentence of the first paragraph should be reworded for clarity.*

Response

The first sentence will be reworded as follows:

"Site 29 was added to the RI/FS investigation at NAS Whiting Field between 1992 and 1993 because of the presence of a waste oil UST. The UST stored point oil and solvents from the 1940's until 1990."

USEPA Response *The response states the UST stored point oil and solvents. I'm not familiar with point oil. Please verify this statement.*

Response

The response included a mistype. The response should have read, "The UST stored paint oil and solvents from the 1940's until 1990."

Additional Comments:

In addition, as we previously discussed, the information related to the investigation of PSC1485C should be removed from this document and compiled into a separate document.

Response

PSC 1485C has been redesignated Site 41, and all references to PSC 1485C or Site 41 have been removed from this report. Investigation of Site 41 and all findings will be presented in a separate report.