

N60508.AR.000316
NAS WHITING FIELD
5090.3a

ELECTRONIC MAIL REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION ADDITIONAL THOUGHTS ON DATA GAPS AT SITE 40 NAS WHITING FIELD
FL
9/3/2009
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

From: [Smith, Larry](#)
To: [Newman, Katie](#)
Subject: FW: Some Additional Thoughts on Data Gaps for Whiting Site 40
Date: Sunday, December 06, 2009 10:14:28 AM
Attachments: [NAS WF: Site 2894: Copy of the Site Assessment Report's Conclusions-Recommendations.pdf](#)
[NAS WF: JW's response to doc: Site 2894: Site Assessment Report: Tt NUS_062107.pdf](#)

AR?

-----Original Message-----

From: Winters, John [<mailto:John.Winters@dep.state.fl.us>]
Sent: Thursday, September 03, 2009 1:08 PM
To: Benedikt.Craig@epamail.epa.gov; Jaynes, Mike; benjamin.kissam@navy.mil; May, Rich; michael.pattison@navy.mil; Smith, Larry; Amy.Twitty@CH2M.com; michael.a.singletary@navy.mil; jones.elliott@epa.gov
Cc: Winters, John
Subject: RE: Some Additional Thoughts on Data Gaps for Whiting Site 40

Hello all.

While Elliott is/was on a role, I would also like to add my \$0.02 in. Attached to this email are the conclusions/recommendations from the Site Assessment Report Tetra Tech NUS completed in June 2007. FDEP reviewed and commented on this report (see attached response to document letter) by letter on September 16, 2008. To date, the Navy has not provided a response to comments to my letter. This needs to be completed by the Navy. The SAR points out several conspicuous things which FDEP thinks the Navy should be aware of and take action on (which I was trying to point out at the DQO meeting). Some of the conspicuous things noted by FDEP during the SAR review were:

--soil contamination being present at the site, which was delineated in the ABB-ES 1993 CAR; the most elevated contaminant concentrations are present near monitoring well WHF-2894-MW-6.

--FID screening of soil samples was conducted and excessively contaminated soil, as defined by 62-770(19), was found. ABB concluded excessive soil contamination extended to a depth of 55 feet bls, and Tt NUS results indicated excessive soil contamination around WHF-2894-MW-7 at depths of 6 to 28 ft bls. A DPT FID soil boring sample collected from the 16 to 18 ft depth from boring WHF-2894-B03 exhibited the highest FID result of 1,995 ppm.

Tt NUS also states in this SAR that the FID screening results for soil samples matched the results of the 1993 CAR produced by ABB-ES in 1993.

--Free Product info--During a semi-annual gw sampling event on March 25, 2004, AEROSTAR gauged approximately 3 inches of floating NAPL at monitor well WHF-2894-MW-7; Free product measurements from 2004 to 2006 showed monitor well WHF-2894-MW-7 contained a measurable thickness of 0.24 ft of free product on June 25, 2004, on June 10, 2005, a minimal sheen of 0.01 ft was recorded in WHF-2894-MW-7 and in the temp well location WHF-2894-B08, no free product was detected in WHF-2894-MW-7 on October 6, 2005 but 0.02 ft of product was measured in this well on February 7, 2006.

--Tt NUS points out in the conclusion portion of this report that Monitor well WHF-2894-MW-7 may act as a vertical conduit and potentially channel free product to the previously uncontaminated upper water-bearing zone at 75 feet bls.

--Please review the rest of the conclusions and recommendations in this SAR (see attached).

I/FDEP expect a path forward for Site 2894 to look similar to the recommendations that Tetra Tech presented in their SAR dated June 2007. I have not seen the groundwater monitoring data that Tread/Navy was verbally presenting at the DQO meeting on August 26. However, even if this data shows the perched groundwater in the site area is below GCTLs, this does not take into account what is happening with 1) the leaching potential of the soil/unsaturated zone at the site, 2) deep perched groundwater, 3) the surficial aquifer at and down gradient of Site 2894, and 4) what happened to the free product being encountered at the site. Also, confirmatory soil sampling will need to be conducted to show that the soil meets SCTL and leaching criteria.

To answer one of Elliott's questions/comments in his email, I think proposed monitor well locations for 39S (stayed the same at the DQO meeting) and 42S (moved to a new location just NE of where it is currently located on the map to coincide with a CH2M Hill monitor well location) should remain where they were located following/during the meeting. Instead, I was thinking (maybe should have voiced it) the contingency monitor well would be used in this area to plug the "data gap" that Elliott is mentioning in his email (see below). The North Field Well is approximately 750 ft down gradient of Site 2894. As a regulatory agency, we need to know this drinking water well is protected/not compromised. The West Field Well is approximately 1500 ft down and side gradient (maybe more side gradient?) but may also be in "danger." A second (possibly a third) contingency well may be needed if the first is needed elsewhere. If the Partnering Team can't agree on a location for a monitor well that would collect appropriate data for both the North and West Field Wells at the same time then a third would be needed. This same discussion needs to take place concerning Site 1438/1439 and the South Field Well (the South Field plume maps need to show Site 1438/1439 on them for better orientation)

Thank you for your attention to this matter. If you have questions and/or comments pertaining to this email please contact me. Have a safe and wonderful Labor Day Weekend.

John

John Winters, P.G.
Florida Department of Environmental Protection Bureau of Waste Cleanup Federal Programs Section
850/245-8999
Fax: 850/245-7690
John.Winters@dep.state.fl.us

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of

service you received. Copy the url below to a web browser to complete the DEP

survey: <http://survey.dep.state.fl.us/?refemail=John.Winters@dep.state.fl.us> Thank you in advance for completing the survey.

From: Benedikt.Craig@epamail.epa.gov [<mailto:Benedikt.Craig@epamail.epa.gov>]
Sent: Monday, August 31, 2009 10:32 PM
To: Mike.Jaynes@tetrattech.com; benjamin.kissam@navy.mil; Rich.May@tetrattech.com; michael.pattison@navy.mil; Larry.Smith@tetrattech.com; Amy.Twitty@CH2M.com; Winters, John; michael.a.singleary@navy.mil
Subject: Some Additional Thoughts on Data Gaps for Whiting Site 40

All -

Below is an email from Elliott Jones on some additional data gaps which came to mind following the DQO meeting. We can discuss this further during the call on the 14th.

Thanks,

Craig

Craig A. Benedikt
Senior Remedial Project Manager
Federal Facilities Branch
US EPA, Region 4
(404) 562-8555
(404) 562-8518 FAX
Benedikt.Craig@epa.gov

"This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential or privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email immediately and destroy all copies of this message."

♻️ Reduce Reuse Recycle - Please consider the earth before printing this email ù

Craig,

At the end of the meeting yesterday, some dates were being discussed for future meetings, including Sept 3, Sept 11 (10 am), and Sept 14 (9 am). I did not quite understand the nature/purpose of all these meetings, but it did not sound like my participation would be required. Please let me know if you need me to attend any of them; and, if so, what my role would be.

There are apparently recent (less than 2 years ago) GW sampling data that may be available from the Site 2894 UST area. Whoever was discussing the data (I often had a hard time knowing who was speaking), did not seem to believe COC concentrations were too elevated in the area. Apparently, 3 inches of free product were detected there in March 2004 and an additional investigation is pending, according to a ppt presentation from the March 18, 2008 Partnering Meeting. The (unknown) speaker indicated the free product has been reduced to just a "sheen" currently. Perhaps, the wells have been somehow purged or vented to remove the product--I do not know how the removal was achieved. It would be useful to know more about the "additional investigation" and recent remedies applied at Site 2894, and I would like to examine the recent data from Site 2894, if made available to us.

The larger North Field COC plumes centered at Sites 03, 04, and 32 are upgradient of the North Field (water-supply) Well, but Site 2894 is only about 200 yards from the North Field Well, and only 400 yards directly upgradient of the West Field (water-supply) Well. There are no GW monitoring wells between Site 2894 and the West Field Well. With respect to an RI, a lack of GW sampling data at Site 2894 is a substantial data gap. If COCs are elevated at Site 2894, there may be no way to determine how far the plume may extend toward the West Field Well without constructing additional monitoring well(s) between Site 2894 and the West Field Well.

Also, in retrospect, the presence of COC plumes at Site 2894 could influence the placement of proposed new monitoring wells WHF-1467-MW-39S and WHF-1467-MW-42S. It was impossible for me to follow the minutia of the discussion on the substitution, movement, and final placement of the proposed wells, because the maps in MeetingPlace were incomplete on my screen. If you have access to marked-up, or revised images resulting

from the meeting, I would appreciate having a digital copy.

Thanks for the opportunity to attend the meeting and add my \$0.02. Although rather long and tedious at times, I learned a lot about the site, became acquainted with some of the players, and am beginning to understand the unique politics involved in remedial efforts at Whiting Field.

Please call or email me if you want to discuss further these and/or other issues pertaining to Whiting Field.

- Elliott

L. Elliott Jones, P.E.
USGS/EPA Technical Liaison
EPA Region 4 - Superfund Division
Technical Services Section
61 Forsyth Street, SW
Atlanta, GA 30303
404-562-8505 (Mon-Wed)
jones.elliott@epa.gov