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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON THE INITIAL ASSESSMENT STUDY NAS WHITING FIELD FL
9/6/1985
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

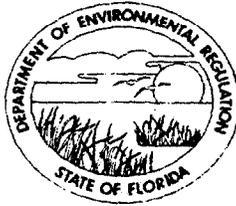
STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL

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CO

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

September 6, 1985

Whiting Field/11

Commanding Officer
Department of the Navy
Naval Air Station
Whiting Field
Milton, Florida 32570

Dear Sir:

I have enclosed the department's review comments for the "Initial Assessment Study of the Navy Air Station, Whiting Field". The memoranda express the concerns of both the Northwest District Office and our Technical Project Support Section in Tallahassee.

Since the Naval Assessment and Control of Installation Pollutants Program is designed to assure a comprehensive assessment and control of the migration of environmental contamination, inclusion of our comments should assist in this goal. If you have any further questions regarding this matter, please contact me at 904-488-0190.

Sincerely,

Margaret V. Jones for

Eric Muzie
Environmental Supervisor

Enclosures

cc: Wayne R. Mathis
Thomas W. Moody
R. A. Kechter
✓Sonny Chestnut

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

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To: _____ LOCTN: _____
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TO: Eric Nuzie
FROM: Thomas W. Moody *TW*
DATE: August 21, 1985
SUBJECT: Initial Assessment Study of the Naval Air Station
Whiting Field, Milton, Florida

In 1984 the Department reviewed a Hydrogeologic Assessment and Groundwater Monitoring Plan for Whiting, prepared for the Navy by Geraghty and Miller, Inc. We were under the impression at that time that this plan was part of the NACIP studies program. That plan makes the comment on page 3 that the Navy had made an initial assessment at Whiting in 1983, and had identified 12 sites, nine of which were recommended for further study. The plan goes on to recommend ground water monitoring at these nine sites. The present IAS covers 10 of those 1983 12 sites plus six more. Navy should provide us with the 1983 study and comment on the correlation between its 12 sites and this study.

Lead is not the only constituent of concern in fuels; purgeables such as benzene, toluene, xylene and naphthalene (base neutral) should be tested. Ground water should also be sampled at fuel spill sites 4, 7, 8, 9, and 12 for water soluble fractions of fuel.

TWM//tmf

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AUG 22 1985

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INTEROFFICE MEMORANDUM

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TO: Eric Nuzie

THROUGH: John Gentry *JG*

FROM: James Crane *JJC*

DATE: August 14, 1985

SUBJECT: Initial Assessment Study, Naval Air Station (NAS)
Whiting Field, Milton - Review and Comments

I have reviewed the subject document. The purpose of an IAS is to identify and assess sites posing a potential threat to human health or the environment due to contamination from past hazardous materials. This report identified 16 sites and recommended 15 sites for confirmation studies. The site not recommended for further study was an area used for disposal of construction and demolition debris.

This report recommended sampling locations and testing parameters for each of the 15 sites which will be investigated in the confirmation stage. I have concerns with the testing parameters that are stated as being site-specific. I do not believe that the Navy or the consultants know with much certainty the identity of the wastes that were disposed of in the open disposal areas and landfills (Sites 1, 10, 11, 13, 14, 15, 16). The list of indicator testing parameters (Table 3-2) are constituent-specific and are not indicative of a great variety of other constituents that may have been deposited in the sites, e.g. benzene, trichloroethylene, etc. The initial set of samples, analyzed for from each of these sites, should be tested for the EPA Priority Pollutants as well as the few non-Priority Pollutants listed in Table 3-2 of this report. Later analyses of the wells can be for those parameters that were identified in the initial screening.

Testing parameters for Site 3, Underground Waste Solvent Storage, should include, in addition to those listed, methylene chloride, MIBK, arsenic, barium, mercury, selenium, silver, and phenols; these were all listed as constituents of the sludges (Appendix B).

The sludge disposal areas (Sites 4, 7, 12) are to have soil sampling for lead. Because of the large volume of saturated sludges buried at each site, particularly 4 and 7, I believe one well should also be drilled to the water table and analyzed by EPA test method 602 for volatile aromatics and by appropriate EPA methods for lead and EDB.

Memorandum
August 14, 1985
Page Two

Site 8, AVGAS Fuel Spill, is to have soil sampling for lead. I have reviewed the Geraghty & Miller study which addressed this site previously. The G & M report speculated that the fuel evaporated and that the remainder was bacterially biodegraded; no data was collected. At that time I recommended at least one well to the water table which should be tested for volatile aromatic hydrocarbons (EPA Method 602), lead and EDB. Now this report cites the Geraghty & Miller speculation as fact and justification for no ground water sampling. I still recommend ground water confirmation; after all, we are talking about 25,000 gallons of AVGAS.

Site 9, Waste Fuel Disposal Pit, by virtue of the potentially large volume of waste fuel disposed of in the pit, should have one well drilled to the water table and should be tested for volatile aromatic hydrocarbons (EPA Method 602), lead and EDB.

Site 5, Battery Acid Seepage Pit, has been the object of a DER enforcement case. DER has negotiated and approved a preliminary assessment workplan by Geraghty & Miller. The workplan approved by DER should be the basis for the study done at Site 5, and should supersede the plan submitted in this report in whatever areas the two plans differ.

This report states that waste paints, thinners, solvents, waste oils and hydraulic fluids were taken to fire fighting training areas. These areas should be identified, investigated and the soils and ground water sampled using EPA Methods for metals, volatile organics, base neutrals and PCB's. The practice, as I understand it, is to dump the wastes into a pit or on the ground and to ignite the wastes for fire fighting practice.

If these preliminary activities such as confirmation studies are to be used to determine that the past practices have not caused human health or environmental problems, including violation of the State of Florida's regulations, the work needs to incorporate our concerns into the decision making in terms of which sites are to be recommended for confirmation studies, which media are to be sampled and which parameters are to be tested. I hope my comments will result in some modifications of the recommendations in this report since I have concerns about some of them.

JC/ke

cc: Bill Kellenberger