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NAS WHITING FIELD
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LETTER REGARDING ADDITIONAL COMMENTS ON U S NAVY RESPONSES TO U S EPA
REGION IV COMMENTS ON REMEDIAL INVESTIGATION FEASIBILITY STUDY WORK PLAN
NAS WHITING FIELD FL
5/4/1990
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROT

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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Ref: 4WD-RCRA&FF

Mr. Ted Campbell
NAVFAC-ENGCOM
Southern Division
2155 Eagle Drive
P.O. Box 10068
Charleston, SC 29411-0068

RE: Navy Responses to EPA Comments on the RI/FS Work Plan at NAS
Whiting Field

Dear Mr. Campbell:

As discussed at the NAS Whiting Field TRC on April 10, 1990, the following Navy responses to EPA comments on the RI/FS Work Plan were considered inadequate by EPA:

- * Comment 10. A site specific justification for deviance from EPA protocols must be provided to EPA. Technical requirements have been previously transmitted to Southern Division.
- * Comment 11. EPA protocol is to tremie bentonite pellets into monitoring wells. Justification for not following this process must be in the Work Plan along with an alternate method that will prevent bridging.
- * Comment 12. EPA does not agree that a 2-foot sand pack between the screen and cement grout is sufficient to prevent contamination of the well with the grout. Please clarify in the Work Plan the difficulties in placing bentonite pellets in 200-foot wells along with an alternate method to prevent contamination.
- * Comment 15. Explain in your Work Plan the historical operation of the production wells that is the basis for the pump test.
- * Comment 24. If protective measures are standard Navy practice, they should be included in the Work Plan.
- * Comment 28. EPA would not normally approve a plan under an FFA with more than 24 months to complete the technical and reporting requirements of an RI/FS. However, since you are not subject to an FFA with EPA, it is only our recommendation to complete the RI/FS in less than 24 months.
- * Comment 31 and 34. Other Navy installations have agreed to use EPA protocols on decontamination. Field data acquired without using EPA protocol may be rejected for future use if Whiting Field is placed on the NPL.

The Navy needs to include the above changes and explanation in the revised Work Plan.

If there are any questions regarding this letter, please contact Nancy Dean at (404) 347-3016.

Sincerely yours,

For 

James H. Scarbrough, P. E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

cc: Cindy Black, NAS Whiting Field
Eric Nuzie, FDER