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NAS WHITING FIELD
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REVIEW AND COMMENTS ON FINAL REMEDIAL INVESTIGATION FEASIBILITY STUDY AND TECHNICAL MEMORANDUMS ONE THROUGH SIX NAS WHITING FIELD FL
7/15/1992
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

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Florida Department of Enviro

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 15, 1992

Ms. Kimberly Queen
Code 1859
Department of the Navy
Naval Facilities Engineering Command
Southern Divsion
2155 Eagle Drive
P.O. Box 10068
Charleston, SC 29411-0068

Dear Ms. Queen:

Department personnel have completed the technical review of the Final Remedial Investigation and Feasibility Study Technical Memorandums 1 through 6, NAS Whiting Field. I have enclosed a memorandum addressed to me from Mr. Jorge R. Caspary. It documents our commments on this report.

If I can be of any further assistance with this matter, please contact me at 904-488-0190.

Sincerely,

Eric S. Nuzie

Eric S. Nuzie
Federal Facilities Coordinator

Enclosure

cc: Bill Kellenberger
John Mitchell
Lynn Griffin
Jorge Caspary
Satish Katsury
Jim Holland
Robert Pope

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee
To _____ Location _____
To _____ Location _____
To _____ Location _____
From _____ Date _____

Interoffice Memorandum

TO: Eric S. Nuzie, Federal Facilities Coordinator
Bureau of Waste Cleanup

THROUGH: Dr. James J. Crane, PGIII/Administrator JJC
Technical Review Section

FROM: Jorge R. Caspary, P.G. Base Coordinator J.R.C.
Technical Review Section

DATE: June 26, 1992

SUBJECT: Review of Final Remedial Investigation and Feasibility Study Technical Memorandums 1 through 6. May 1992. Naval Air Station Whiting Field.

The above referenced documents have been reviewed and I offer the following comments:

Technical Memorandum No. 1 - Background

The document and the background data are satisfactory for their purposes.

Technical Memorandum No. 2 - Hydrogeological Assessment

The hydrogeological data collected during Phase I of the RI, and presented in this document is satisfactory for its purposes.

Technical Memorandum No. 3 - Soils Assessment

pp. 2-1. It is stated that the soil sampling program was conducted on December 3 and 4, 1991; however, Appendix B shows that the laboratory received the soil samples on December of 1990. Moreover, tables in Appendix C show that the soil sampling for the drainage swales was also conducted on December 4, 1990. If this is the case, explain the delay of over a year in presenting this data.

Acetone seems to be a problem throughout the laboratory analysis. For instance, Appendix C Sample No. 16SL02 presents Acetone at 71,000 ug/kg. The consultant indicates that this may be the result of decay of pesticide grade isopropanol alcohol; however, at the quantitation level presented above, it seems that improper QA/QC protocols are being followed. It is hoped that this problem will be addressed during Phase II.

Technical Memorandum No. 3 - Soils Assessment - Cont'd

Please provide an explanation of the data qualifiers on the various appendices. Also, in future documents, please provide original laboratory data such as those provided in Appendix B.

Technical Memorandum No. 4 - Surface Water and Sediments

The document and the data presented are satisfactory for their purposes.

Technical Memorandum No. 5 - Groundwater Assessment

It is difficult to understand some of the designations for samples in the appendices and figures. For instance, at Site 10 the consultant installed two Cone Penetrometer Tests (CPTs) under the same designation WHF-10-CPT-1, however, the groundwater results table in Appendix A show two different designations, one being WHF-10-WP-01-01 and another WHF-10-WP-02-02; it is not clear to which CPT these samples belong. Another designation/locator system must be implemented to avoid confusion for reviewers of subsequent documents.

Technical Memorandum No. 6 - Phase I Data Summary and Phase II-A Work Plan.

Phase I Data Summary

The summary is adequate for its purposes.

Phase II-A Work Plans

General Comments

While the work proposed in Phase II-A is in general satisfactory, it suffers from a flaw in its approach. It seems that by designating the second stage of work as Phase II A, an additional third stage, presumably "Phase II-B", has already been planned. The approach of dividing the assessment work into three and even four phases has been called into question at other Navy installations by EPA and to an extent, by FDER. Any additional phase to be performed beyond Phase II-A is warranted only when the scope of work to be performed during the previous phase is not sufficient to adequately delineate the extent of contamination in soil or groundwater. As it stands, this document does not make provisisons to accurately delineate the final extent of contamination at sites with confirmed contamination. It is very rigid in the sense that a definite number of soil borings and monitoring wells per site will be installed.

Previous experience has shown that additional work will be needed beyond the so called Phase II-A. To avoid this, it is suggested that the approach presented in this document be revised to be more flexible, that is, additional soil borings and monitoring wells should be installed as needed and, most importantly, while in the field based either on quick laboratory turn around times or by the placement in the field of a portable gas chromatograph in order to make decisions in "real time ". The Navy via budgetary planning and the contractors via a comprehensive Phase II work plan should direct every effort to make Phase II -A the final assessment phase so that the RI/FS process proceeds in a timely manner.

Phase II Workplans Site Specific Comments

Site 1

Figure 7-4. Please explain the rationale in the placement of monitoring well MW-WHF-1-2. It seems upgradient of groundwater flow.

pp 7-13. Due to the fact that the soil and groundwater have not been investigated on the northern part of the site, please expand the soil boring and groundwater assessment program so that it includes this area.

Site 2

A No Further Action (NFA) is proposed for this site. Said NFA is premature at this time due to the size of the site and past disposal activities. At a minimum, additional soil exploration should be conducted upgradient and downgradient of the site.

Site 3

In order to define the horizontal and vertical extent of contamination in the aquifer, the following wells should be installed:.

1.- An upgradient well directly north of WHF-3-2,
2.- A water table well approximately 40 feet west of WHF-3-2D,
3.- A downgradient water table well approximately 20 feet south of the Pumping Station, and
4.- A water table well approximately eighty feet south of WHF-3-CPT-1.

Site 5

Please explain the specific rationale for the installation of monitoring wells WHF5-8S and 8D. They are nine hundred feet north of the site.

Will the sampling in Phase II include a report on the most recent sampling results for the Geraghty & Miller installed wells as well as supply well W-S2?

Site 12

The proposed No Further Action (NFA) at this site is premature. Monitoring wells WHF 12-1 and WHF-CPT-1 are lateral to the groundwater flow, therefore, a water table well should be installed directly downgradient of the site.

pp 138 of RI/FS Planning Document. Volume I of III Workplan. June of 1990, identifies the groundwater flow in this site as mainly due South -Southeast however, CPT-BAT samples were located due east of the site lateral to the already known groundwater flow. Explain the rationale for obtaining soil and groundwater samples lateral to the known groundwater flow.

Site 13

The installation of a water table monitoring well about halfway between WHF11-1 and WHF 13-1 is warranted due to the extent of the landfill and the lack of groundwater investigation in that portion of the site.

Site 16

Groundwater BAT sample WHF-CPT-1 showed Benzene at 400 ug/l;however, no wells have been planned downgradient of such sample. The installation of a monitoring well downgradient of WHF-CPT-1 is warranted to accurately define the horizontal and vertical extent of benzene in that portion of the aquifer.

Site 17

pp 7-37. The text implies that soil samples will either be composited from 0 to 5 feet below land surface or that a discrete soil sample will be taken at 5 foot intervals. Either of these procedures is unacceptable. Given the surficial lithology present throughout the installation and further described by the consultant, soil samples should be obtained from 0 to 2 feet and every 2 feet up to 10 feet below land surface and then every 5 feet to either the water table, or as proposed by the consultant, an approved depth.

Site 17- Cont'd.

pp. 7-35. The figure presented for this site is very general and leaves the reviewer wondering where the exact locations of the fire training pits are. Without a detailed figure, it is difficult to get an idea of the additional work proposed.

Site 18

pp.7-39. Please refer to both comments for the previous site.

Site 29

pp.7-42. Please refer to comments issued for site 17.

Site 30

Please provide a site specific figure. Figure 7-2 shows the location of the waste oil tanks to be investigated, however, the figure points out a rectangular feature without indicating the actual placement of the waste oil tanks.