

N60508.AR.000634  
NAS WHITING FIELD  
5090.3a

LETTER WITH INVITATION TO PHASE 2A TECHNICAL REVIEW COMMITTEE MEETING  
SCHEDULED 30 JUNE 1992 NAS WHITING FIELD FL  
11/6/1992  
NAVFAC SOUTHERN



DEPARTMENT OF THE NAVY  
SOUTHERN DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
2155 EAGLE DR., P. O. BOX 10068  
CHARLESTON, S. C. 29411-0068

16.01.00.0010

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COMMANDING OFFICER, NOT TO  
THE SIGNER OF THIS LETTER.  
REFER TO:

5090  
Code 1859  
06 NOV 1992

U. S. Department of Commerce  
National Oceanic and Atmospheric Administration  
Attn: Mr. Waynon Johnson  
Coastal Resource Coordinator  
c/o USEPA Waste Division  
345 Courtland Street, NE  
Atlanta, Georgia 30365

Subj: NAVY'S RESPONSE TO COMMENTS ON TECHNICAL MEMORANDA 1 - 6 FOR  
THE PHASE I REMEDIAL INVESTIGATION AT NAS WHITING FIELD

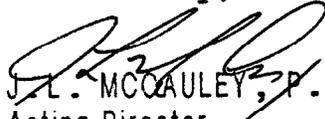
Dear Mr. Johnson:

On behalf of Naval Air Station (NAS), Whiting Field, Southern Division, Naval Facilities Engineering Command would like to invite you to attend a meeting regarding the above subject matter. This meeting will be held at the Environmental Protection Agency's office in Atlanta, Georgia. The meeting will begin at 9:30 AM on Friday, November 13, 1992. We will be meeting with Mr. Robert Pope of EPA Region IV.

Enclosed is a copy of the comments received by the Navy from each respective agency and our response to these comments for your review before the meeting.

We appreciate your input into the work at NAS Whiting Field. If you have any questions, please contact Ms. Kim Queen, Code 1859, Southern Division, Naval Facilities Engineering Command, at (803) 743-0341.

Sincerely,

  
J.L. MCCAULEY, P.E.  
Acting Director  
Environmental Division

Encl:

- (1) Navy's Response to Comments  
on NAS Whiting Field's  
Technical Memoranda 1-6

**RESPONSE TO COMMENTS (Technical Memoranda)**  
of  
**NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION (NOAA)**

Naval Air Station Whiting Field, Milton, Florida

Comment Number	Comment	Response
<b>SOILS, Page 3 - last paragraph</b>		
1.	In the reports, data were interpreted to indicated that PCB contaminant concentrations of 33 ug/kg or less were not of significant concern. This level of contamination is well below the recommended clean-up level (1.0 mg/kg) for PCBs. However, interpretation of this data was difficult because of discrepancies in the data presentation; units are listed in varying units in Technical Memorandum (TM) No. 3, Appendix a). If PCB concentrations were 33 mg/kg, the contaminant levels are high. PCBs are highly persistent pollutants that bioaccumulate. Distribution of this contaminant has not been fully examined and, until the data are clarified, conclusions about its effect and migration from the site are premature.	The reason for suggesting that 33 mg/kg might be present is unclear. Consistent units were used for reporting throughout. But, future data tables will present the concentrations with similar units to prevent confusion.
<b>SOILS, Page 4 - first paragraph</b>		
2.	Units also are listed inconsistently in other Technical Memoranda. Trace element concentrations found in soils (TM 5, Section 3.2; TM 6, Section 4.3.1) are presented in mg/kg units, with lead concentrations being 43.7 mg/kg. in other tables (TM 5, Table 3.1; TM 6, Table 4.1), concentrations are given in ug/kg units, with lead concentrations at 43.7 ug/kg. A concentration of 43.7 ug/kg of lead would be of little concern to NOAA. No conclusions can be made with regards to trace element contamination until discrepancies in the data have been resolved.	The reference made in this comment to TM 5 should be TM 3. Table 3-1 of Technical Memorandum No. 3 has units reported as ug/kg. Units in Table 3-4 of Technical Memorandum 5 are historical data and are correct as mg/kg. Units of data in Table 4-1 (Technical Memorandum No. 6) should be mg/l and not ug/l.

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Comment Number	Comment	Response
3.	<p><b>SOILS, Page 4 - second paragraph</b></p> <p>Detection limits in soils were not presented. Though numerous background concentration ranges were presented, those used for concentration comparisons were not clearly defined. Conclusions cannot be drawn about soil contamination without background concentrations. In addition, other references to soil data were given (TM 6, Section 4.3.3), but these data were not available for review.</p>	<p>Detection limits will be provided in the appendices of future documents.</p> <p>Background inorganic data for soils of the eastern United States, the Gulf Coast of Alabama and Florida, and for clays, sands, or alluvial soils in the United States has been summarized in Technical Memorandum No. 3 (Table 3-2, Background Concentration Ranges for Elements in Soils). Also, 10 surface soil samples will be collected from the three major soil types found at Whiting Field during the Phase II-A field investigation.</p>
4.	<p><b>SURFACE WATER AND SEDIMENTS, Pg 4 - 3rd paragraph, 2nd sentence</b></p> <p>Detection limits provided for most inorganic substances in surface water were much higher than the respective ambient water quality criteria (AWQC).</p>	<p>Analytical methods proposed in the approved RI/FS workplan were strictly followed for all sample analyses.</p>
5.	<p><b>SURFACE WATER AND SEDIMENTS, Pg 4 - 3rd paragraph, last 2 sentences</b></p> <p>Samples from the creeks had low concentration of trace elements, but the fact that the concentrations of iron and aluminum also were low indicates that the samples may have been of coarse-grained sediments. From these data, it is difficult to determine the magnitude or extent of contamination.</p>	<p>Most of the sediments within the Clear Creek stream bed are composed of fine to medium grained sand. The floodplain sediments are composed of clays, silts and sands. Samples from both the stream bed and the floodplain will be collected during the Phase II-A field investigation and will provide additional data on the nature and extent of contamination.</p>

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Comment Number	Comment	Response
<b>GROUNDWATER, Page 5 - last paragraph</b>		
6.	Detection limits for groundwater were not provided. Instead, average background concentrations of trace elements in groundwater are used for comparison. Those data may be misleading due to the fact that groundwater contamination from the site may have affected background groundwater samples. Detection limits can be implied from the data tables, but the lowest concentrations reported exceed recommended screening criteria (ten-times AWQC) by one to two orders of magnitude. Though the methodology of sampling appears to be complete, it is not possible to determine the magnitude or extent of contamination from the data presented.	Detection limits will be provided in the appendices of future documents.  Background monitoring wells, upgradient of all sites, will be installed during the Phase II-A field investigation to provide background water quality data at Whiting Field.  Data gaps identified in Phase I will be evaluated during the Phase II investigation. Therefore, complete data will be available after the next phase of the investigation.
<b>COMMENTS, Page 5 - first paragraph</b>		
7.	The data presented in the documents reviewed were confusing and inconsistent. The text referred to tables that could not be located (TM 6, p. 4-11 reference to TM 5 data for soils), concentrations were reported in units of mg/kg in the text and ug/kg in corresponding tables, and references to specific criteria used for screening in soils were not given. The proximity of the site to East Bay and the hydraulic link to the Bay by way of the creeks in the area suggest that contaminants migrating from this site could pose a significant threat to NOAA trust resources. However, this can not be evaluated fully without complete, accurate data.	The reference to Technical Memorandum No. 5 on page 4-11 of Technical Memorandum should be made to Technical Memorandum No. 3 (Table 3-2).  See responses to comments 1 and 2 regarding chemical concentration units.

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Comment Number	Comment	Response
<b>COMMENTS, Page 5 - second paragraph</b>		
8.	The resources associated with this site are diverse. Pathways to these resources have been documented and the potential for contaminate exposure of trust resources does exist. On the basis of the information currently available, this site represents a threat to NOAA trust resources.	No response required.
<b>COMMENTS, Page 5 - third paragraph</b>		
9.	Additional data regarding the contamination in soils and groundwater on the site should be gathered. Sediment samples from established deposition areas in the creeks below the site would help determine whether off-site migration has been extensive. All samples should be analyzed for the same contaminants, and data should be compiled and presented to delineate source areas and pathways of contaminant migration. Analytical methods used should incorporate detection limits that are equal to or less than appropriate screening guidelines and criteria, where available, for the protection of NOAA trust resources.	Surface water, sediment, soil and groundwater samples will be collected during the Phase II-A RI field investigation to characterize the nature and extent of contamination from each identified site. Any input provided by the reviewer about analytical methods with detection limits that are equal to or less than the screening guidelines will be appreciated.