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NAS WHITING FIELD
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LETTER REGARDING RESPONSE TO COMMENTS REGARDING PHASE 2 REMEDIAL INVESTIGATION SOIL GAS SURVEY TECHNICAL REPORT NAS WHITING FIELD FL
6/9/1993
ABB ENVIRONMENTAL

ASEA BROWN BOVERI

09.01.00.0031

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June 9, 1993

Commanding Officer
ATTN: Kim Queen, Code 1859
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
Charleston SC 29411-0068

SUBJECT: **Response to Comments**
Soil Gas Survey Technical Report
Phase IIA - Remedial Investigation
Naval Air Station Whiting Field, Milton, Florida
Contract Task Order 050
Navy CLEAN District I
Contract N62467-89-D-0317

Dear Kim:

Enclosed please find a draft copy of the ABB-ES response to review comments received from the U.S. Environmental Protection Agency and the Florida Department of Environmental Regulation. Upon receipt of your approval, ABB-ES will submit the Final Response to Comments to the appropriate agencies. If you have any questions, please call me at 904-656-1293 (x 314).

Very truly yours,

ABB ENVIRONMENTAL SERVICES INC.

Rao V.R. Angara
Task Order Manager

Enclosure

cc: File: 7560-xx (4.7.1)
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Jim Holland, NASWF

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RESPONSE TO COMMENTS
of
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Soil Gas Survey - Technical Report
Naval Air Station Whiting Field, Milton, Florida

Comment Number	Comment		Response
	GENERAL COMMENTS		
1.	Contamination levels based on ion counts of 10,000, 85,000, and 100,000 were not related to each other or to other methods of measuring soil or groundwater contamination. Thus, it is ambiguous if the sites surveyed are contaminated, and to what extent.	1.	The soil gas technique does not allow for the comparison between different site groupings. The ion counts at an individual site are relative to each other and the various levels of ion counts were determined by statistical estimation through frequency distribution. The soil gas survey was used not for comparison purposes, but as a screening tool to locate source areas, soil borings, and soil samples.
2.	This document summarizes the extent of soil gas contamination (Table 4-1) for each site based on specific constituents, but lacks composite summary diagrams illustrating overall soil gas contamination. Summary diagrams illustrating overall contamination levels for each site are needed to draw conclusions from this survey.	2.	Composite summary diagrams can not be prepared for each site because the data is presented as "relative ion counts" for each of the contaminants of concern. Soil gas conclusions can be drawn from individual figures.
3.	Conclusions interpreting the data were also omitted. Expected conclusions from this survey would be the identification of contamination areas that warrant further study, and the approximate locations where soil samples, soil borings and monitoring wells are proposed in order to delineate soil and groundwater contamination. It is accepted that definitive plume boundaries or contaminant concentrations can not be drawn from this precursory screening investigation; however, conclusions that could be interpreted should be included in this document.	3.	The intent of this report was to provide the results of the soil gas survey in a technical format and not to present recommendations for further investigations.
4.	The reason the Soil Gas Survey was employed only at sites 3, 5, 6, 29, 30, 32, and 33 needs to be explained.	4.	The soil gas survey was employed at the three Maintenance Hangar areas because these are new sites (Sites 29, 30, 32, and 33) in the RI and no previous investigations have been conducted at these sites. This information was presented in the Phase I RI Technical Memorandum No. 6 that was approved by FDER and USEPA. Once again, the intent of this report was to only provide the results of the soil gas survey.

RESPONSE TO COMMENTS
of
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Soil Gas Survey - Technical Report
Naval Air Station Whiting Field, Milton, Florida

Comment Number	Comment		Response
5.	The reason a screening technique (Soil Gas Survey) was included in the Phase II Workplan, if soil and groundwater contamination has already been determined in the Phase I Technical Memorandums, needs to be explained.	5.	See response to Comment 4.
6.	A copy of the "Standard Operating Procedures for Applying the Petrex Technique to Environmental Soil Gas Surveys" (Appendix A, RI Phase I Technical Memorandum No. 6), crucial to understanding this screening technique, should have been included in the Soil Gas Survey.	6.	Agree. Applicable standard operating procedures will be included as appendices in future documents.
	SPECIFIC COMMENTS		
1.	Atoms behave paramagnetically above the Curie-Point, not below this point, as stated on page 2-2. Above the Curie-Point is "the temperature at which a material loses its ability to retain magnetism" and thus behaves paramagnetically.	1.	Agree.
2.	The areas of concern of PCE relative ion count for the Auto Hobby Shop - Site 29 are based on counts greater than 100,000 as documented in the text (page 3-11), but only counts greater than 10,000, as illustrated on Figure 3-10. Which one is incorrect?	2.	The correct ion count should be greater than 10,000.
3.	The features in Figure 1-2 are illegible. A smaller scale is needed, such as one used repeatedly in the RI Phase I Technical Memorandums.	3.	Agree. A smaller scale will be used in future documents.