N60508.AR.000669
NAS WHITING FIELD
5090.3a

LETTER REGARDING THE REVIEW AND COMMENTS ON THE PHASE 2A REMEDIAL INVESTIGATION TECHNICAL MEMORANDUM 1 SURFACE WATER AND SEDIMENT ASSESSMENT NAS WHITING FIELD FL
6/10/1993
U S EPA REGION IV

03.01.00.0035

1D 00061

UNITED STATES ENVIRONMENTAL PROTECTIC

REGION IV

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

JUN 10 1993

4WD-FFB

Certified Mail
Return Receipt Required

Captain James Eckhart
Commanding Officer
Naval Air Station Whiting Field
Milton, Florida 32570-5000

Re: Remedial Investigation Phase II-A
Technical Memorandum No. 1
Surface Water and Sediment Assessment
Naval Air Station (NAS) Whiting Field
Milton, Florida

Dear Captain Eckhart:

The Environmental Protection Agency (EPA) has completed its review of the above referenced document. This review is provided to the Navy under the consultation provisions for the Installation Restoration Program (IRP) specified in Section 211 of the Comprehensive Environmental Response, Compensation, and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (CERCLA/SARA). Overall, the document is well done. However, EPA has various concerns regarding the presentation of data, interpretations of data, and the conclusions based on those interpretations. These concerns are addressed in both the General Comments and Specific Comments section of this review document. In addition, there are a few comments addressing field problems noticed during a recent site visit after the TRC meeting of May 20, 1993. Comments on the Surface Water and Sediment Assessment need to be addressed by making the necessary changes in the document. Comments from the site visit need to be addressed by reporting what actions have taken place to correct the deficiencies.

If you have any question regarding these comments, please contact Mr. Robert H. Pope, of my office, at (404)347-3016.

Sincerely,

C Warren for

Jon D. Johnston, Chief
Federal Facilities Branch
Waste Management Division

Printed on Recycled Paper

cc: Kimberly Queen, SOUTHDIV-NAVFACENGCOM

James Crane, FDER

David Clowes, FDER

James Holland, Public Works Division,
NAS Whiting Field

Waynon Johnson, NOAA

John Mitchell, FDNR

Lynn Griffin, FDER

James Lee, DOI

EPA COMMENTS ON REMEDIAL INVESTIGATION PHASE II-A
TECHNICAL MEMORANDUM NO. 1
SURFACE WATER AND SEDIMENT ASSESSMENT

GENERAL COMMENTS

Overall, the document is well-written and coherent. It presents the data obtained from the Phase II-A sediment and surface water sampling in a logical manner. However, supporting data necessary to relate the Phase II-A surface water and sediment sampling events to the data collected from the Phase I sampling event is insufficient. A figure showing the Phase I surface water and sediment sample locations relative to the Phase IIA sample locations must be provided. In addition, the Phase I sample data should be tabulated and presented along with the Phase II-A data. Detailed descriptions and data correlating both the Phase I and Phase II-A sample locations to potential sources of contamination and to the drainage pathways into Clear Creek should also be provided.

Another sampling phase is proposed at Phase II-A stations 4 and 7 to determine the extent of contamination in the Clear Creek floodplain sediments. Station 4 was identified in RI/FS Technical Memorandum No. 4 (named Station 2 in the Phase I sampling) as a location potentially receiving discharge from sites 15 and 16. The potential for migration of contaminants into the floodplain sediments and into Clear Creek from the drainage pathways originating at Sites 15 and 16 (sources of contamination) should be investigated more thoroughly. All additional samples collected from the floodplain sediments or from Clear Creek should be analyzed for the full Target Compound List/Target Analyte List (TCL/TAL) for risk assessment purposes.

The conclusion reached concerning contaminant distribution is logically flawed. The document concludes that "based on the absence of organic compounds above CRDLs (Contract Required Detection Limits) and on comparison of inorganic analytes to "background sample" concentrations, no significant environmental contamination appears to be present in the Clear Creek surface waters and sediments." This conclusion is not supported by the sample data collected during Phase I and Phase II-A. Organic and inorganic contaminants have been detected in the Clear Creek surface water and sediments. However, according to TM No. 1, all detected organic contaminants are attributed either to laboratory artifacts, contaminants introduced during sample handling/

decontamination procedures or nonsite-related background contamination. Additionally, the inorganic contaminants detected in the floodplain and Clear Creek sediments have been compared to published regional soils data rather than site-specific sediment data. The resulting conclusion presented from this flawed reasoning is invalid. Rather, Clear Creek surface water and sediments exhibit some environmental contamination resulting from NAS Whiting Field.

SPECIFIC COMMENTS

1. Page 1-7, Paragraph 2:
It is stated that "Sites 4, 7, and 8 are slated for investigation and remediation, if necessary, under the Navy's UST program". It was agreed at the end of Phase I of the RI during the TRC meeting that sites 4 and 7 are not automatically exempt from CERCLA and therefore, full TAL/TCL scans would be run on samples in order to make an informed decision on how they should be investigated and remediated in the future. The text does not mention this at all. Change the text to reflect the agreement between the Navy, USEPA, and FDER concerning sites 4 and 7.

2. Page 1-11, 1-12:
A variety of wetlands habitats located along the floodplain of Clear Creek are described in TM No 1. However, it is not clear from the text and figures 1-3 and 2-1 where the boundaries of these wetlands habitats occur. A figure should be provided showing the boundaries of individual wetlands habitats along Clear Creek.

3. Page 1-11, 1-12:
A figure should also be provided showing the boundaries of the habitats of the endangered plant species along Clear Creek. The specific locations at which the endangered species, the white-topped pitcher plant, have been observed should be clearly marked on the figure.

4. Page 3-23, Paragraph 4:
The "J" qualifier is used far too broadly in all the tables summarizing the detected contaminants. For example, if a contaminant is also detected in the Quality Assurance/Quality Control (QA/QC) samples, the detected concentration should be qualified with a "B" rather than a "J." Please refer to the USEPA Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual, (Part A), Section 5.4, pages 5-11 thru 5-16 for proper use of qualifiers. All of the tables in TM No 1 need to be modified and corrected accordingly.

5. Page 3-30, Paragraphs 3 and 8; Page 3-31; and Page 3-25, Paragraph 2:
It is not accurate to compare regional soils data to the

contaminant concentrations detected in the Clear Creek floodplain sediments or sediments in Clear Creek. Comparison to background samples obtained from the Clear Creek floodplain sediments and from sediments in Clear Creek would be more accurate. Do not use regional background soils data for comparison. In Phase I, this was allowed due to a lack of site specific background samples. However, it was stated at that time that regional backgrounds would not be acceptable during later sampling events.

6. Page 3-30, Paragraph 5, Table 3-6:
The text of TM No. 1 does not agree with Table 3-6. The text should state that 1,2-dichloroethene (13 micrograms per kilogram [ug/kg]) and total xylenes (11 ug/kg) were also detected in floodplain sediments, in addition to acetone and methylene chloride.

MAY 20-21, 1993 - SITE VISIT COMMENTS

1. During the site visit and the inspection of newly installed wells for Phase II-A of the RI, it was noticed that all the wells currently being installed are not surrounded on the four corners of the cement pad by the required posts. Due to experiences at other facilities, it was requested by USEPA that "bumper guards" be installed around all monitoring wells to insure that the wells are not damaged or destroyed during grounds maintenance or other activities. Replacement of wells is, as you know, very expensive. In addition, data from damaged wells is questionable and may not be accepted. During the 1992 TRC meeting the Navy agreed to follow all the Region IV SOP guidelines for monitoring well installation. Please refer to that manual's Appendix E, Section 4.1 for proper MW installation.

2. None of the wells, new or previously installed, had weep holes in the surface casings. Please address this deficiency immediately in the newly installed wells and as soon as possible on the older Geraghty and Miller and Phase I wells.

3. During a walk through the flood plain of Clear Creek, it was noticed that the over-packed barrel and an additional rusted out barrel removed from the floodplain were just sitting out exposed at a remote location. USEPA recommends moving these to a proper storage facility and disposing of them as soon as possible.

4. During a walk-over of site 7 it was discovered that the UST contractor had already removed the tanks and back-filled the pits with clean fill dirt. Were any soil samples taken of the removed fill? If so, what were the results? Considering that this action seems to have taken place quite some time ago, USEPA requests an explanation as to why no data has been reported in order to make a decision on putting this site in the CERCLA program or leaving it in the UST program.