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NAS WHITING FIELD  
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RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS  
ON SURFACE WATER AND SEDIMENT ASSESSMENT NAS WHITING FIELD FL  
6/30/1993  
NAVFAC SOUTHERN

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**RESPONSE TO COMMENTS**  
of  
**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**Technical Memorandum No. 1, Surface Water and Sediment Assessment**  
**Naval Air Station Whiting Field, Milton, Florida**

Comment	Response
<b>SPECIFIC COMMENTS</b>	
1. The Florida Surface Water Quality Standards (FSWQS) for Class III Surface Water were exceeded for copper, iron, lead, mercury, nickel, and silver; however, Section 3.1.4 (Surface Water Applicable or Relevant and Appropriate Requirements) denies that any surface water samples exceeded these standards. This needs to be explained and reanalyzed using appropriate standards.	Exceedances of Florida Surface Water Quality Standards (FSWQS) for Class III, freshwater, for copper, iron, lead, mercury, nickel, and silver will be included in Technical Memorandum No. 1.
2. The source of the surface water and floodplain contamination has not been determined. Possible sources include contaminated soil, groundwater, surface water, and abandoned drums. The identification and abatement of the source(s) should be a high priority in the Phase IIA field work.	Agree.
3. Many of the samples were flagged with the qualifier "J", meaning contamination was detected either below the CRDL, in the laboratory blank preparation or in the quality control (field or rinsate) blanks. Whether the samples were cross-contaminated or just contain levels below the CRDLs should be explained for each sample. If the differences can not be explained, the samples are assumed to be cross-contaminated, warranting the need to resample with stricter quality control/quality assurance.	All surface water and sediment samples were collected in accordance with USEPA Standard Operating Procedures of 1991, analyzed, and the results validated in accordance with CLP protocol and NEESA guidelines meeting all the QA/QC requirements. Samples have been validated with a "J" qualifier based on contaminants detected in the quality control or laboratory blanks and the rationale for the qualification is presented in the data validation case narratives in Appendix B.

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4.	Section 3.3 (Surface Water and Sediment Summary and Conclusions) does not emphasize pesticides, PCBs and inorganic analytes in sediments to the same extent as VOC for exceeding the NOAA Effects Range Low (ER <sub>L</sub> ) and USEPA guidelines. Why is this? Are non-VOC contaminants not considered as great a potential risk as VOCs.	The intent of the summary and conclusions section was to briefly summarize the results and conclusions of Technical Memorandum No. 1. No reference of VOCs exceeding NOAA and USEPA sediment guidelines is found in Section 3.3. Section 3.3 indicates that several exceedances of the AWQC standards and NOAA and USEPA guidelines were identified and refers the reader to Sections 3.1.4 and 3.2.3 for details.
5.	The reason why Big Coldwater floodplain sediments were not sampled needs to be explained.	<p>The reasons for not collecting floodplain samples from Big Coldwater Creek are as follows.</p> <ol style="list-style-type: none"><li data-bbox="1024 752 1970 798">1. No releases or spills of contaminants are known to have occurred into NAS Whiting Field drainage ditches that discharge into Big Coldwater Creek.</li><li data-bbox="1024 833 1931 878">2. Reconnaissance of the floodplain conducted during the Phase I RI surface water and sediment sampling program indicated no presence of contamination.</li><li data-bbox="1024 913 1964 987">3. Surface water and sediment samples collected from Big Coldwater Creek and the drainage ditch to the Big Coldwater Creek from NAS Whiting Field during the Phase I RI showed no presence of contamination.</li><li data-bbox="1024 1023 2007 1199">4. Unlike Clear Creek where contamination was observed and detected in the floodplain and had IR sites within 300 feet of it, the nearest IR site to Big Coldwater Creek is approximately 2 miles. To reach the Big Coldwater Creek floodplain, contaminants would have to travel a minimum of 2 miles overland through unlined drainage ditches during very high water or via groundwater migration (with calculated seepage velocities of 0.8 foot per day) and would not typically be expected to accumulate in the floodplain sediments at detectable concentrations.</li></ol>
		A statement will be included in Technical Memorandum No. 1 indicating that surface water and sediments were not collected from Big Coldwater Creek during Phase II A and that no further sampling will be conducted in Big Coldwater Creek or its floodplain.