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NAS WHITING FIELD  
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LETTER REGARDING THE SUBMITTAL OF U S NAVY RESPONSE TO COMMENTS AND  
FINAL REPORT OF TECHNICAL MEMORANDUM 1 SURFACE WATER AND SEDIMENT  
ASSESSMENT NAS WHITING FIELD FL  
7/14/1993  
NAVFAC SOUTHERN

5090  
Code 1859

14 JUL 1993

Mr. Robert Pope  
U.S. Environmental Protection Agency  
Region IV  
345 Courtland Street  
Atlanta, GA 30365

Dear Mr. Pope:

Southern Division, Naval Facilities Engineering Command, is pleased to submit the final report and the response to comments for Technical Memorandum Number One, Surface Water and Sediment Assessment, on behalf of Naval Air Station (NAS), Whiting Field, Milton, FL.

If you have any questions or comments regarding this report or response to comments, please contact me at (803) 743-0341.

Sincerely,

Kimberly D. Queen  
Environmental Engineer  
Installation Restoration I

Encl:

- (1) Technical Memorandum Number One Final  
Report and Response to Comments (2 copies)

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**RESPONSE TO COMMENTS**  
**of**  
**U. S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV**

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

Comment Number	Comment	Response
<b>SPECIFIC COMMENTS</b>		
1.	<p><u>Page 1-7, Paragraph 2:</u> 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 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.</p>	<p>A statement identifying the status of Sites 4, 7, and 8 will be added.</p>
2.	<p><u>Page 1-11, 1-12:</u> 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.</p>	<p>A locational survey to identify the wetland areas has not been conducted at NAS Whiting Field. Therefore, a figure was not included in the report. A survey identifying the wetland habitats and white-topped pitcher plant colonies will be conducted in conjunction with future investigations of the Clear Creek floodplain.</p>
3.	<p><u>Page 1-11, 1-12:</u> 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.</p>	<p>Please see response to comment 2.</p>

**RESPONSE TO COMMENTS**  
of  
**U. S. ENVIRONMENTAL PROTECTION AGENCY, REGION IV**

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

Comment Number	Comment	Response
4.	<p><u>Page 3-23, Paragraph 4:</u> The "J" qualifier is used too broadly in all the tables summarizing the detected contaminants. For example, if a contaminant is also detected in 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 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.</p>	<p>Page 14 of the referenced document in Comment No. 4 identifies U, J, R, Z, Q, and N as the qualifiers for validated data. No 'B' qualifier is present. These qualifiers match the list provided in the Functional Guidelines for data validation. The 'B' qualifier is a laboratory qualifier used to identify blank contamination (organics) and concentrations between the IDL and the CRDL (inorganics).</p>
5.	<p><u>Page 3-30, Paragraphs 3 and 8; Page 3-31; and Page 3-25, Paragraph 2:</u> 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.</p>	<p>Since the submittal of Technical Memorandum No. 1, additional sediment samples have been collected from the Clear Creek floodplain under a separate investigation. One of the sediment samples collected, an upstream background floodplain sediment sample, will be used for comparison to sediment samples collected from Stations 4, 7, and 9. Surface water and sediment samples collected from within Clear Creek have been compared to the upstream background surface water and sediment sample collected at Station 1. All references to regional background concentrations will be removed from the text.</p>
6.	<p><u>Page 3-30, Paragraph 5, Table 3-6:</u> The text of TM No 1 does not agree with the 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.</p>	<p>Agree.</p>

## GENERAL COMMENTS

The following general comments were identified by the USEPA.

1. Phase I data should be included in the Phase II report:
2. Phase I sampling locations should be presented in the Phase II report.
3. Discuss the contamination in the Clear Creek floodplain sediments.
4. The conclusion that "no significant environmental contamination appears to be present in the Clear Creek surface waters and sediments" is incorrect.
5. The comparison of Clear Creek sediments and floodplain sediments to regional soils data is not appropriate.

The Navy appreciates the comments received from the U.S. Environmental Protection Agency for the Technical Memorandum No. 1 submitted in April 1993. The Navy agrees with most of the comments provided by the USEPA. Responses to these comments are provided below.

1. Adding data from the earlier investigations to the current report will set a precedence where all projects may require the data from the earlier phases to be incorporated in the current investigation. In several instances it will be a very time consuming process (e.g., surface soil data, Phase IIA has 180 surface soil samples). Therefore, the Navy has adopted the policy of referencing the earlier documents and in some instances reproducing portions of the database.
2. As recommended by the USEPA, a figure presenting the Phase I sampling locations will be added to the report.

In order to expedite the investigative phase of the floodplain area, the Navy is conducting a separate investigation at this site. The data from this investigation have been presented in a report titled the *Clear Creek Floodplain Investigation Report* submitted in July 1993.

4. The conclusion will be changed to read "no significant environmental contamination attributable to NAS Whiting Field appears to be present in the Clear Creek surface water and sediments". No organic compounds were detected above the CRDL. Several CRDLs from USEPA approved CLP analytical methods exceeded the AWQC and FSWQS ARARs and the background concentrations for lead and silver also exceeded the surface water ARARs. However, as mentioned in the summary and conclusions, contamination was detected in the Clear Creek floodplain sediments and is currently being investigated under a separate program.
5. The Clear Creek sediments and surface waters were compared to a background sample (WHF-2A-STA01-SD01 and WHF-2A-STA01-SW01) collected during the Phase IIA study. The sediment samples collected from the Clear Creek floodplain will be compared to a background sediment sample that has been collected since the submittal of Technical Memorandum No. 1. All references to regional soils data will be removed from the report.

**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 Number	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.