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NAS WHITING FIELD  
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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REVIEW COMMENTS ON SURFACE WATER AND SEDIMENT ASSESSMENT NAS  
WHITING FIELD FL  
9/13/1993  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

09.01.00.0038

00346

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

September 13, 1993

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Jeff Adams  
Remedial Activities Branch  
Department of the Navy  
Southern Division  
Naval Facilities Engineering Command  
Post Office Box 190010  
Charleston, South Carolina 29419-9010

Dear Mr. Adams:

Department personnel have completed the technical review of the RI/FS Phase II-A, Technical Memorandum No. 1, Surface Water and Sediment Assessment, NAS Whiting Field. I have enclosed a memorandum addressed to me from Mr. David M. Clowes. It documents our comments on the referenced report.

If I can be of any further assistance with this matter, please contact me at 904/488-0190.

Sincerely,

A handwritten signature in cursive script that reads "Eric S. Nuzie".

Eric S. Nuzie  
Federal Facilities Coordinator

ESN/bb

Enclosure

cc: David Clowes  
James Holland  
Bill Kellenberger  
Lynn Griffin  
John Mitchell  
Allison Drew

TO: Eric S. Nuzie, Federal Facilities Coordinator  
Bureau of Waste Cleanup

THROUGH: James J. Crane, P.G./Administrator *JJC*  
Technical Review Section

Jorge R. Caspary, Professional Geologist *JRC*  
Technical Review Section

FROM: David M. Clowes, Base Coordinator *DME*  
Technical Review Section

DATE: September 1, 1993

SUBJECT: Remedial Investigation and Feasibility Study (RI/FS)  
Phase II-A, Technical Memorandum No. 1, Surface  
Water and Sediment Assessment, Naval Air Station  
Whiting Field, Milton, Florida.

I have reviewed the above stated document, dated July 1993 (received July 30, 1993), submitted for this site. The following comments need to be addressed before this document can be considered final:

1. The ARARs, Florida Surface Water Quality Standards (FSWQS) and the Ambient Water Quality Criteria (AWQC), were exceeded by 1,2-DCE (Table 3-3) and inorganic analytes (Table 3-4); thus, the surface water of Clear Creek is contaminated. The statement in Section 3.3 (Surface Water and Sediment Summary and Conclusion) that "no significant environmental contamination attributable to NAS Whiting Field appears to be present in Clear Creek surface water and sediments" is incorrect, because it ignores the ARARs when assuming that the surface water is not contaminated since the levels are below the Contract Required Detection Limit (CRDLs). The contrast between the ARARs and CRDLs reveals that the CRDLs are not sensitive enough to conclude the presence/absence of contamination and that the QA/QC protocol needs reassessment before any conclusions can be drawn from the data. Additionally, if the CRDLs are too insensitive, other contaminants could possibly be present in the surface water and sediment but undetected. As well, if the watershed of Clear Creek is within NAS Whiting Field, then what other sources could be contributing to the contamination?
2. The presence of the background samples above the ARARs does not negate the validity of the field samples, which have multiple times higher levels than the background samples, of being considered contaminated (See Comment #1 above).

MEMORANDUM

Eric S. Nuzie

September 1, 1993

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3. SVOCs, pesticides, PCBs, and inorganic analytes exceed the ARARs for sediments (NOAA Effects Range Guidelines and USEPA Sediment Quality Criteria), thus Clear Creek/Clear Creek Floodplain sediments are contaminated (See Comment #1 above).
4. Station 2 of Phase I and Stations 4 of Phase II-A are supposedly positioned at the same/similar locations; however as illustrated on Figure 2-1, these stations are in different locations. What is the reason for this?
5. The text lacks an explanation to the different sample numbering systems, making the reader guess the station locations that samples were collected.