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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV REVIEW WITH CONCERNS ON TECHNICAL
MEMORANDUM ONE REMEDIAL INVESTIGATION NAS WHITING FIELD FL
9/23/1993
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IV

340 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30256

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

Post-It [®] brand fax transmittal memo		67	# of pages 11
To: ERIC BLOMBERG	From: JEFF ADAMS		
Co: ABB-ES	Co: SOUTH DIV		
Dept:	Phone # 823-743-0341		
Fax # 904-877-0742	Fax #		

Re: Remedial Investigation Phase II-A
Technical Memorandum No. 1
Surface Water and Sediment Assessment (Final)
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).

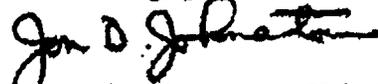
Overall, the document is well done. However, EPA has specific concerns regarding the presentation of data, interpretations of data, and the conclusions based on those interpretations in Technical Memorandum No. 1 - Surface Water and Sediment Assessment (Tech Memo 1). Until these concerns are properly addressed EPA will not accept this document as final. Comments on the Surface Water and Sediment Assessment need to be addressed by making the necessary changes in the document. Resubmission of the document is not required, simply add or correct the necessary pages and forward them to EPA.

Previously, the Navy asked for and received permission to submit documents to the regulatory agencies in a Draft Final form first, and then in the final form in order to expedite the review process. Permission was granted under the auspices that necessary changes would be made in the documents before the final form was submitted. However, many of the Navy's responses to EPA's comments on the Draft Final Tech Memo 1 do not address the noted deficiencies in the document and are not acceptable. The resulting Final of Tech Memo 1 is inadequate. Due to this experience, the practice of submitting documents in a Draft Final and then a Final form is no longer feasible. Therefore, the

review process will revert to the standard schedule for CERCLA sites. In the future the Navy will submit all documents in a Draft form first. The EPA will require sixty (60) days for review. The Navy will then respond to comments, make the necessary changes, and submit a Draft Final of each document within sixty (60) days. The EPA will require only a thirty (30) day period for review. If the Draft Final document is acceptable, EPA will use it as a Final document. If the Draft Final is not acceptable, corrections will be made and the proper pages forwarded to EPA for replacement/inclusion in the Final document within thirty (30) days.

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

Sincerely yours,



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

- cc: Jeff Adams, SOUTH DIV-NAVPACENCOM w/enclosure
- David Clowes, FDEP w/enclosure
- James Crane, FDEP
- James Holland, Public Works Division,
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- Lynn Griffin, FDEP
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**EPA COMMENTS ON REMEDIAL INVESTIGATION PHASE II-A
TECHNICAL MEMORANDUM NO. 1
SURFACE WATER AND SEDIMENT ASSESSMENT
(FINAL)**

GENERAL COMMENTS

The Navy was responsive to the majority of the comments on TM No. 1; however, some of the comments were not fully resolved. Most importantly, the conclusion that "no significant environmental contamination attributable to NAS Whiting Field appears to be present in the Clear Creek surface water and sediments" is logically flawed, unacceptable and should be stricken from the report in any form. The data results may be below the CRDLs, but so called "J" data is still useable. Conclusions regarding whether or not contamination is environmentally significant will be made during and following a risk assessment. It is inappropriate to try and make that decision at this time. A more correct conclusion should recommend no further investigation work within Clear Creek and its sediments, due to current results.

SPECIFIC COMMENTS

Specific comments are listed on the following pages in the order of their occurrence in the Navy's response to comments. Each comment refers to the section number, page number or figure as it was referenced in the response to comments.

1. Response to EPA General Comment No. 1 on TM No. 1:
It is acknowledged that it may not be practical to reproduce large sets of data for incorporation into TM No. 1. However, any data pertinent to the current investigation should be included. Only 8 surface water and sediment samples were taken during Phase I at Cold Creek and at the very least they need to be tabulated and presented in the Phase II Tech Memo 1 for comparison.
2. Response to EPA Specific Comment No. 3 on TM No. 1, Pages 1-11 and 1-12:
The comment states that a figure should be provided showing the specific locations at which the endangered species, the white-topped pitcher plant, has been observed. The Navy's response was that a survey will be conducted in conjunction with future investigations to identify white-topped pitcher plant colonies. TM

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No. 1 states that "numerous specimens of the white-topped pitcher plant were observed in the vicinity of three of the Clear Creek surface water and sediment sampling stations" and also that the white-topped pitcher plant "has been previously observed elsewhere at NAS Whiting Field within the Clear Creek floodplain." It would appear that the Navy could provide a figure showing the specific locations at which endangered species have been observed, while stating that additional locations will be determined in a future survey. In addition, if the Navy is currently unable to provide such a figure, it must be stated that such a figure will be produced in a certain document by a certain date.

3. Response to EPA Specific Comment No. 4 on TM No. 1, Page 3-23, Paragraph 4:
The Navy's response to the comment is accurate regarding the use of the 'B' qualifier. However, the 'J' qualifier still appears to be too broadly used, based upon information on Form A, "Explanation of Organics Data Qualifiers," in Appendix B of TM No. 1. This form lists the term 'UJ-B' and 'J-B' for compounds that were identified in the laboratory blank sample. In addition, the 'J' qualifier is listed with a series of suffixes that further explain why the value reported was estimated.

4. Response to EPA Specific Comment No. 6 on TM No. 1, Page 3-30, Paragraph 3:
This comment was addressed to a limited degree. The text lists acetone as being detected at only Station 4, while it was also detected at Stations 8 and 12.

Comments on the Technical Memorandum One of Phase IIA RI

- Table 3-1 (Pages 3-2 to 3-16).
Some SDWA values are incorrect; I have listed the correct values here:
Lindane: MCLG = 0.2 ug/L.
Aluminum: SMCL (Secondary MCL) = 50-200 ug/L.
Fluoride: MCL/MCLG = 4000 ug/L; SMCL = 2000 ug/L.
Lead: action level for potential drinking water is 15 ug/L.
Manganese: has a "listed" MCLG of 200 ug/L (EPA Office of Water, 5/93).

Several AWQC For Protection of Human Health values are not in agreement with the current (12/92) version of the EPA Region IV Criteria Chart for the Clean Water Act (attached).
- Page 3-18 Section 3.1.2), third and fourth paragraph -
"All analytes in Table 3-4 that are flagged "J" were detected below the CRDL, or detected in the laboratory preparation blank, and/or in the associated QC blanks...". Risk Assessment Guidance for Superfund, Vol. I Human Health Evaluation Manual (Part A) (EPA, December 1989) (RAGS) identifies the "J" qualifier as an indicator of an estimated value due to the quantity being less than the CRQL and the "J" data as suitable for use in the risk assessment. RAGS does not identify "J" as an indicator of blank contamination. (Exhibits 5-4, 5-5 in RAGS) Please clarify the use of the data qualifiers. RAGS does give specific guidance as to the assessment of blank contamination (see comment below).

Specific comment on the Clear Creek Floodplain Investigation Report

- Page 4-5, last two lines of page - For purposes of the baseline risk assessment, chemical concentrations which are thought to be due to blank (laboratory and/or field) contamination should be assessed using the specific guidance set forth in RAGS, Section 5.5. RAGS states that, for common laboratory contaminants (including acetone and methyl ethyl ketone), sample results should be considered as positive results only if the concentration in the sample exceed ten times the maximum amount detected in any blank. For chemicals which are not considered common laboratory contaminants, sample results should be considered as positive results only if the concentration in the sample exceed five times the maximum amount detected in any blank.