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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV REVIEW AND COMMENTS ON THE REMEDIAL
INVESTIGATION PHASE 2A AND CLEAR CREEK FLOODPLAIN INVESTIGATION NAS
WHITING FIELD FL
9/30/1993
U S EPA REGION IV



03.01.00.0046

1D-00072

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

SEP 30 1993

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Re: Remedial Investigation Phase II-A
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 lacking in technical completeness. 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. Comments on the Clear Creek Floodplain Investigation Report need to be addressed by making the necessary changes in the document.

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

Sincerely,

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

Enclosure

cc: John Mitchell, FDEP
James Lee, DOI
David Clowes, FDEP w/encl.
Lynn Griffin, FDEP
James Crane, FDEP
Waynon Johnson, NOAA

James Holland, Public Works Division, NAS Whiting Field
Jeff Adams, SOUTHDIV-NAVFACENCOM w/encl.

USEPA COMMENTS ON CLEAR CREEK FLOODPLAIN INVESTIGATION REPORT
NAVAL AIR STATION WHITING FIELD
MILTON, FL

GENERAL COMMENTS

The goal of the CCFI was to "identify and characterize the nature and extent of contamination in the Clear Creek floodplain sediments in the vicinity of Site 16 and also attempt to determine the source of the contamination." This goal, however, was not achieved as neither the full extent nor the source of contamination was determined. The Navy needs to refrain from making sweeping goal statements when it is obvious that they have not been able to conduct a thorough investigation of an area. The Navy recommends that "further exploration in the northwest corner of the study area" be conducted in order to determine the lateral extent and potential source of the contamination. However, "further exploration" should also be conducted in the immediate vicinity of the concrete drainage ditch outfall. The text states on page 2-1 that "much of the surface water within the study area" comes from this concrete drainage ditch, which drains rainwater from the western end of the South Field runways. One of the more obvious locations for a sediment sample would be in the unnamed tributary near the outfall of this drainage ditch. However, the nearest sample to the outfall (collected in the tributary) is more than 200 feet downstream. It is therefore requested that two sediment samples (and surface water) be collected from the unnamed tributary, one within 10 feet of the drainage ditch outfall and the other approximately 100 feet downstream before the confluence with Clear Creek. These samples should be analyzed for full scan target compound list/target analyte list (TCL/TAL) constituents to adequately characterize the nature and extent of contamination in this area. Samples collected in the northwest portion of the study area should also be analyzed for full scan TCL/TAL constituents.

SPECIFIC COMMENTS

1. Page 2-1, Paragraph 2:
The paragraph discusses a concrete drainage ditch, but does not name the ditch. In previous reports the ditch seems to have been labeled ditch "A". Please explain why this report is not consistent with other reports.
2. Page 2-1, Section 2.2:
The section titled "Ecological Characterization" is completely inadequate. One of the main concerns about contamination in the floodplain is potential harm to

the ecosystem. Apparently, no attempt has been made to better characterize the ecology of the area. The "Characterization" is simply copied out of earlier documents. Figures delineating differing ecosystems are not provided. In addition, the fauna of the area are not described. Further, there is no mention of contacting the proper federal and/or state agencies (USFWS, etc.) for lists of potential ecological receptors in the area. The text in section 2.3 states that the problems were originally brought to light during a "qualitative ecological study". Why then are there no results of that study included in this report?

3. Page 2-3, Figure 2-2:
The scale of 1" = 20' listed in the lower right corner of this figure does not match the easting and northing scale along the perimeter of the figure.
4. Page 2-4, Paragraph 1:
During the Phase I RI, 12 samples were taken for both Clear Creek and Big Coldwater Creek. However, only 8 samples were actually taken in Clear Creek and its floodplain.
5. Page 2-4, Paragraph 1:
A summary of the sampling results from the previous investigations must be included in tabular form in the CCFI Report for reference.
6. Page 2-4, Paragraph 2:
The text states that "The Phase II-A sample was analyzed and showed...concentrations above estimated background concentrations." The Navy has already been cautioned several times about using estimated or regional backgrounds. Only site specific backgrounds are acceptable.
7. Page 2-4, Paragraph 3:
Identify Station 2 and Station 4 on the site layout map.
8. Page 2-4, Paragraph 3:
The text refers to an area of approximately 2 acres located halfway between the concrete drainage ditch outfall and Clear Creek. This area should be designated on the site layout map.
9. Page 2-4, Paragraph 4:
The text refers to a sediment sample that was collected in December 1992. Specify, both in the text and on the site layout map, the location from which this sample was collected.
10. Page 3-1, Paragraph 6:

The text refers to 72 sediment samples collected from the Clear Creek floodplain using stainless-steel hand augers. Specify to what depth these samples were collected. Also, the statement that 72 sediment samples were collected is contradictory to page 4-1, paragraph 4, which states that 71 samples were collected. Neither of these numbers match the number of sample locations shown on Figure 3-2. This discrepancy should be clarified.

11. Pages 3-2 and 3-3, Figures 3-1 and 3-2:
See Specific Comment No. 1.
12. Page 4-1, Paragraph 1:
The text states that anomalies in the blue areas on figures 4-1 and 4-2 are "due in part to the presence of the three rusted 55-gallon drums observed on the ground surface in the vicinity." However, these blue areas do not correspond exactly with the drum locations shown on Figure 2-2. Explain this apparent discrepancy.
13. Page 4-1, Paragraph 3:
The data from the two EM-31 profiles should be included in the CCFI Report.
14. Page 4-5, Paragraph 2:
In addition to the further investigation recommended in the northwest corner of the study area, further investigation should also be conducted in the immediate vicinity of the concrete drainage ditch outfall. See General Comments.
15. Page 4-5, Paragraph 7:
Although acetone and methyl-ethyl-ketone (MEK) are often common laboratory contaminants, they are also common solvents used on NAS Whiting Field. Were acetone and MEK detected in laboratory blanks or in any blanks of note? If not, what basis does the Navy have in completely disregarding detection of the solvents? Previous reports listed waste paints, solvents, and thinners as being disposed of at Site 16 for a period of 22 years. Dismissing detection of expected contaminants is not logical.
16. Page 4-9, Table 4-2:
The analytical results from the background sample have to be included in this table.
17. Page 4-9, Table 4-2:
See Specific Comment No. 11. Also, the concentration of aroclor-1260 for sample location WHF-CCF-SD-08 should be listed as 680 micrograms/kilogram instead of with a dash (-).

18. Page A-1, Appendix A:
It appears that TPH sample taken on 3/22/93 at time 1,456 should read 14,037.38, not 1,4037.38.
19. Appendix A:
Appendix A contains numerous blank areas in coordinate columns, TPH readings, and even sheen and odor notation. Explain.
20. Appendix B:
Lab sample 35480001 lists the acetone value as 42 U, but the detection limit is noted as 27. Several other samples display a similar discrepancy. Please explain or rectify these apparent validation mistakes.