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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
9/30/1993
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RESPONSE TO COMMENTS
of
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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

	Comment	Response
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?	The detection of 1,2-DCE was in the floodplain surface water and not Clear Creek surface water. Although some FSWQS and AWQC standards were exceeded in Clear Creek surface water, the source of these analytes can not be attributed to NAS Whiting Field because many of the CRDLs and upstream background concentrations exceed the ARARs. The proposed methods of analysis in the RI/FS workplan were approved by USEPA and FDEP prior to sampling. It is requested by the Navy that FDEP propose methods of inorganic analysis that have detection limits below the FSWQS and AWQC standards. Once the recommendation has been made by FDEP, surface water samples will be collected and analyzed for inorganic elements that have TAL inorganic CRDLs above the ARARs. Additionally, concentrations of inorganic analytes in the upstream background surface water sample that exceeds the ARARs would be the result of naturally occurring conditions or from an upstream source unrelated to NAS Whiting Field.
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).	See response to Comment No. 1.
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).	SVOCs, pesticides, PCBs, and inorganic analytes exceeded ARARs for sediments in the Clear Creek floodplain sediments and not in the Clear Creek sediments. The Navy agrees that the floodplain sediments are contaminated and additional investigations will be conducted in the Clear Creek floodplain.

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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?	Station 2 is in the wrong location in Figure 2-1 and should be located where the Phase II-A Station 4 is located.
5.	The text lacks an explanation to the different sample numbering systems, making the reader guess the station locations that samples were collected.	The text in future documents will provide an explanation of the different sample numbering systems.