N60508.AR.000706
NAS WHITING FIELD
5090.3a

LETTER REGARDING U S NAVY RESPONSES TO U S EPA REGION IV COMMENTS ON CLEAR CREEK FLOODPLAIN INVESTIGATION NAS WHITING FIELD FL
11/9/1993
NAVFAC SOUTHERN

DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
2155 EAGLE DR., P.O. BOX 190010
NORTH CHARLESTON, S.C. 29419-9010

03.01.00.0051

1D-00077

PLEASE ADDRESS REPLY TO THE COMMANDING OFFICER, NOT TO THE SIGNER OF THIS LETTER.
REFER TO:
5090/13
Code 18510

09 NOV 1993

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

Dear Mr. Pope:

The Navy appreciates the USEPA's comments to the Clear Creek Floodplain Investigation (CCFI) Report and included as an attachment are the Navy's responses to the comments. Many of your concerns regarding the presentation of data, interpretations of data, and conclusions based on the data do not appear to reflect the discussions that took place prior to the inception of the CCFI. It was decided during the discussions that we would send the results of the CCFI to you and FDEP in the form of a summary report similar to the data release reports that have been prepared during the Phase II-A RI at NAS Whiting Field. These reports provide you with the field and analytical data so you do not have to wait until data gaps are filled and the final report is prepared. As a result of the CCFI, recommendations to fill data gaps were made and additional investigations are planned for the first half of 1994.

Please find enclosed the Navy's response to USEPA's comments on the Clear Creek Floodplain Investigation report. If you have any questions please contact Mr. Jeff Adams, Code 18510, at (803) 743-0341.

Sincerely,

J B Malone

JAMES B. MALONE, P.E.
Head, Installation
Restoration I Division

Encl:
(1) Navy's response to EPA's comments on the Clear Creek Floodplain Investigation Report

RESPONSE TO COMMENTS
of
ENVIRONMENTAL PROTECTION AGENCY

Clear Creek Floodplain Investigation Report
Naval Air Station Whiting Field, Milton, Florida

Comment Number	Comment	Response
	GENERAL COMMENTS	
1.	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 20 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.	The objective of the CCFI: " 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.", remains the objective and although the goal was not achieved during the CCFI, data gaps were identified and additional investigations will be conducted to fill these data gaps. The contamination was found to extend over an area greater than expected and due to budgetary constraints, additional investigations could not be conducted at the time of the CCFI. In future documents, the status of the investigation will also be provided after the objectives have been presented. Although the concrete drainage ditch outfall may be one of the more obvious locations for sediment sample collection, it is one of the least contaminated areas. No petroleum sheen was observed (which is apparent at sampling locations with elevated TPH readings) in the sandy sediments near the drainage ditch outfall. The sediment at the drainage ditch outfall consists of fine to medium sand with virtually no clay or organic matter which is characteristic of the sediment 150 feet downstream. Because the sediment has no clay or organic matter the adsorption of contaminants to these sediments is limited. This is apparent in the TPH screening results (Figure 4-3 of the CCFI report). The elevated TPH readings (greater than 1000 ppm) do not begin until the organic rich sediments were encountered approximately 150 feet downstream. Future sampling efforts will be concentrated in areas where screening data indicates the presence of contamination. Samples collected in the northwest portion of the study area will be analyzed for full scan TCL/TAL constituents.

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Comment Number	Comment	Response
	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.	The labeling of the "A" ditch was inadvertently omitted. The "A" ditch will be labeled in future CCFI 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?	The characterization of the ecology was not the objective of the CCFI. The "Ecological Characterization" section was only included to provide the reader with a brief overview of the ecology in the Clear Creek floodplain. The ecological characterization of NAS Whiting Field is not complete. Results of ecological surveys conducted to date and future ecological work will be presented in the Baseline Risk Assessment Workplan which is scheduled to be completed in the spring of 1994.
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.	Agree. The scale will be changed in future CCFI reports to reflect the easting and northing scale.
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.	The reference to the Phase I samples will be changed in future reports to include samples collected from Big Coldwater Creek.

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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.	As discussed in previous project managers meetings, due to the large number of sample data available, it is not feasible to include all data from previous investigations in current and future reports. Appropriate references will be cited.
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.	This sentence should be deleted. As shown in section 4.3 of the CCFI report, site-specific background samples have been collected for comparison. Regional background concentrations are no longer used by the Navy at NAS Whiting Field.
7.	Page 2-4, Paragraph 3: Identify Station 2 and Station 4 on the site layout map.	Stations 2 and 4 will be identified on the site layout map in future CCFI reports.
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.	This area will be designated on the figure when referenced in future CCFI reports.
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.'	The location of the sample collected in December 1992 will be shown on figures when referenced in future CCFI documents.

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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.	The correct number of sediment samples collected is 72. Three samples were omitted form Figure 3-2 because they were located outside the figure border and off the grid. The grid will be expanded in future figures to show all sampling locations.
11.	Pages 3-2 and 3-3, Figures 3-1 and 3-2: See Specific Comment No. 1.	See response to 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 show on Figure 2-2. Explain this apparent discrepancy.	Although the drum locations do not line up exactly with the anomalous zones, the drums can influence the magnetic field readings from their locations that are 10 to 20 feet outside the anomalous zone boundaries.
13.	Page 4-1, Paragraph 3: The data from the two EM-31 profiles should be included in the CCFI Report.	If geophysical surveys are conducted in future investigations, all data will be included in the 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 response to General Comments.

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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.*	Sediment samples from locations with the highest concentrations of MEK and acetone will be resampled during the next sampling event in the Clear Creek floodplain to confirm or deny the presence of these two VOCs in the sediment. Although the document identifies MEK and acetone as common laboratory contaminants, they will be considered during the baseline risk assessment.
16.	Page 4-9, Table 4-2: The analytical results from the background sample have to be included in this table.	Table 4-2 summarizes only the detections of SVOCs. As described in the text, no SVOCs were detected in the background sample.
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 (-).	Agree.
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.	Agree.
19.	Appendix A: Appendix A contains numerous blank areas in coordinate columns, TPH readings, and even sheen and odor notation. Explain.	The blanks indicate that no information is available. Some sample coordinates were off the grid and no grid numbers were recorded, a few sheen and odor observations were inadvertantly omitted, and all samples were not screened for TPH due to time constraints.
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.	The "10 times" blank rule for common contaminants allows a qualification of data greater than the CRDL as non-detects. Therefore, 42 U is a correct data point and not an apparent error as identified by the reviewer.