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NAS WHITING FIELD
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LETTER REGARDING THE MINUTES FROM 10 NOVEMBER 1993 MEETING WITH U S EPA
REGION IV NAS WHITING FIELD FL
12/16/1993
NAVFAC SOUTHERN

5090/13
Code 18510

16 DEC 1993

Mr. David Clowes
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399

Subj: RPM MEETING 10 NOV 1993 IN ATLANTA, GA.

Dear Mr. Clowes:

Please find enclosed the minutes to the 10 November 1993 RPM Meeting at USEPA. Per our discussions we will maintain the present two stage (Draft Final and Final) review process on a trial basis and provide EPA and FDEP with a Draft document for conceptual review at the time we receive the document from the contractor. We will respond to any concerns FDEP or EPA might have and incorporate these responses into the document and submit it as the Draft Final. Once we receive comments on the Draft Final from EPA and FDEP, we will incorporate the responses into the document and resubmit only the changed pages along with the responses to FDEP and EPA for review. If the changes are not satisfactory we will meet and reach consensus prior to the document becoming Final.

If you have any questions, please contact Mr. Jeff Adams, Code 18510, at (803) 743-0341.

Sincerely,

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

Encl:
(1) 10 Nov 93 RPM Meeting
Minutes

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MEETING MINUTES
RESPONSE TO COMMENTS/DOCUMENT REVIEW MEETING
NOVEMBER 10, 1993
NAVAL AIR STATION WHITING FIELD

On November 10, 1993, representatives of ~~the~~ Southern Division Naval Facilities Engineering Command (SDIV), Florida Department of Environmental Protection (FDEP), Tallahassee Office, United States Environmental Protection Agency (USEPA) Region IV, and ABB Environmental Services, Inc. (ABB-ES) met at the offices of USEPA in Atlanta, Georgia, to discuss the U.S. Navy responses to regulator's comments on the following documents pertaining to Naval Air Station (NAS) Whiting Field, in Milton, Florida:

- *Remedial Investigation/Feasibility Study Phase IIA, Technical Memorandum No. 1, Surface Water and Sediment Assessment, NAS Whiting Field, Milton Florida, July, 1993*
- *Clear Creek Floodplain Investigation Report, NAS Whiting Field, Milton, Florida, July, 1993*

The following personnel were in attendance:

NAME	Phone #s	AFFILIATION
Mr. Jeff Adams, EIC	(813) 743-0341	SDIV, Charleston, S.C.
Mr. Robert H. Pope	(404) 347-3016	USEPA, Atlanta, GA
Mr. Eric S. Nuzie	(904) 488-0190	FDEP, Tallahassee, FL
Mr. David Clowes	(904) 488-0190	FDEP, Tallahassee, FL
Mr. Eric Blomberg	(904) 656-1293	ABB-ES, Tallahassee, FL
Mr. Rao Angara	(904) 656-1293	ABB-ES, Tallahassee, FL
Mr. John A. Bleiler	(617) 245-6606	ABB-ES, Wakefield, MA

The meeting commenced at 10:30 with an introduction of all participants. The meeting agenda included review and discussion of the Navy responses to regulatory (USEPA and FDEP) comments on the two above-referenced reports prepared by ABB-ES for NAS Whiting Field.

Prior to the review of the comments and responses, Mr. Angara distributed a document containing all regulatory comments and responses (including proposed responses) on the above-referenced documents. This document was comprised of nine chapters: each chapter contained a different set of regulatory comments followed by either existing or proposed Navy responses to comments.

The following meeting minutes summarize the review of comments and responses, in the chronological order in which they were discussed:

1. Response to USEPA Comments of September 23, 1993 on the RI Phase IIA Technical Memorandum No. 1, Surface Water and Sediment Assessment

Cover Letter Comments

The cover letter comment regarding the need for future Draft, Draft Final, and Final documents (rather than Draft Final and Final) was tabled until the afternoon session. USEPA raised concerns in the September 23, 1993 cover letter regarding the following phrase in Technical Memorandum No. 1: "no significant environmental contamination attributable to NAS Whiting Field appears to be present in Clear Creek surface waters and sediments". In particular, Mr. Pope found the use of the words "significant" and "attributable" to be beyond the scope of the technical memorandum (i.e., these terms represent an interpretation of data, rather than a statement of fact). The Navy agreed to strike these two words from the sentence in question and to limit future technical memoranda to statements of facts, rather than interpretations in data. In addition, the Navy agreed to better differentiate between Clear Creek and the Clear Creek Floodplain, thereby minimizing confusion regarding these two different study areas.

Mr. Pope raised concerns regarding the Contract Required Detection Limits (CRDLs) in surface water. In particular, Mr. Pope was concerned that CRDLs for several inorganic analytes exceed chronic federal Ambient Water Quality Criteria (AWQC). Rather than immediately pursuing costly Special Analytical Services (SAS) methods with lower CRDLs, the Navy proposed collecting one surface water sample from Clear Creek. This sample would be collected from approximately 1000 to 2000 feet upstream of the furthest existing upstream sample to see if contaminants (inorganic analytes) are coming from an upstream source or may be naturally occurring in surface water. The sample will be analyzed for TAL inorganics. If the sample is not contaminated, samples from the locations where ARARs were exceeded will be collected and analyzed (using special analyses) for inorganic analytes with CRDLs above the applicable ARARs. If special analyses are required, Mr. Pope will contact USEPA ESD to request low detection analytical methods that can be used to lower the CRDL below the applicable ARARs.

Specific Comments

Comment 1: Mr. Pope indicated that USEPA would prefer that all data relative to the current investigation be included in Technical Memorandum 1. The Navy agreed to include (to the responses) a table summarizing all data relative to the Clear Creek investigation. In future reports, the Navy will include small data sets (e.g., 10 samples or less) from previous investigations. Mr. Angara proposed and all parties agreed that in the future, all relevant data (including data from previous investigations) will be submitted in electronic format, as well as in hard copy.

Comment 2: Mr. Pope indicated that the Navy should provide a figure showing the specific locations of white-topped pitcher plants (*Sarracenia leucophylla*) at the Clear Creek Floodplain site. Mr. Bleiler presented a brief summary of the four-day ecological field program conducted by ABB-ES in October 1993, at the Clear Creek Floodplain site. During this ecological field program, ABB-ES collected data regarding the: (1) major ecological community types existing at the Clear Creek Floodplain in the vicinity of Site 16; and, (2) the approximate abundance and distribution of pitcher plants at the site. In addition, the wetland/upland boundary at the Clear Creek Floodplain was field-delineated with surveyor's flagging during this field program.

Mr. Bleiler indicated that a second state-listed plant, a sundew (*Drosera intermedia*), was also observed at the Clear Creek Floodplain site during the recent ecological field investigation. It was agreed that the Navy will submit a trip report summarizing the existing data regarding rare and endangered plants at the Clear Creek Floodplain site by December 31, 1993. This report will include a figure showing the approximate abundance and density of pitcher plants and sundews at the site. Pitcher plant and sundew distributional data will be superimposed on the existing 50 foot-on-center magnetometer grid map. Within each 50-by-50 foot grid square, the figure will present the approximate number of pitcher plants and sundews observed by ABB-ES during the October 1993 field program. Numbers of pitcher plants per grid square will be expressed as a range of numbers (i.e., 0-5, 5-10, 10-20, 20-50, 50-100, 200 plus), rather than as a cardinal number.

Comment 3: Mr. Pope raised concerns regarding the use of data qualifiers; particularly, Mr. Pope indicated that the "J" qualifier appears to be used too frequently in Technical Memorandum No. 1. The Navy explained that while the "J" data qualifier may appear to be over-used, validation reports in Appendix B of the Technical Memorandum explain the "J" qualification for each sample. All parties agreed that this treatment of the "J" data qualifiers was adequate but could be clarified through the use of an index or summary page in Appendix B.

Comment 4: Mr. Pope and Mr. Clowes indicated that some confusion exists in the Technical Memorandum regarding the distinctions between contaminants in Clear Creek and the Clear Creek Floodplain. In addition, Mr. Pope and Mr. Clowes stated that more explanation and detail was required regarding environmental and QC samples. The Navy agreed to more clearly distinguish, both in text and in tables, between Clear Creek and the Clear Creek Floodplain.

Comments on the Technical Memorandum One of Phase IIA

Comment 1: Mr. Pope indicated that several ARARs for surface water have been updated since Technical Memorandum No. 1 was completed. These include Safe Drinking Water Act (SDWA) and AWQC values for lindane, fluoride, aluminum, lead, and manganese. The Navy agreed that any future deliverables would include the updated values for these analytes, and that the values used in any future risk assessments would be the most current values.

Specific Comment on the Clear Creek Floodplain Investigation Report

Comment 1: Mr. Pope inquired about the statement regarding the determination that contaminants in the Clear Creek Floodplain may be laboratory contaminants. In particular, he expressed concerns that acetone and methyl ethyl ketone (both common laboratory contaminants) may also have been disposed of at the site. Mr. Bleiler and Mr. Blomberg stated that the ecological and public health risk assessments, through the use of RAGs guidance, would include a separate evaluation of site versus laboratory contamination. All parties agreed that this evaluation would address any relevant concerns.

Mr. Pope proposed that the meeting adjourn for lunch at approximately 11:45. The meeting continued after lunch with discussion of FDEP comments on the NAS Whiting Field documents.

2. Response to FDEP Comments of September 1, 1993 on the RI Phase IIA Technical Memorandum No. 1, Surface Water and Sediment Assessment

Mr. Clowes stated that many of the FDEP comments were adequately addressed through the morning discussion of the USEPA comments and the Navy's responses. Mr. Clowes only addressed those responses that remained unclear or were found to be unacceptable to FDEP. All other responses were agreed to by FDEP.

Comment 4: Mr. Clowes indicated that Figure 2-1 in the Technical Memorandum had some discrepancies regarding sample station locations. The Navy agreed to revise and include this figure in the responses, with both sample identification numbers and station identification numbers.

3. Response to FDEP Comments of August 24, 1993 on the Clear Creek Floodplain Investigation Report, NAS Whiting Field, Milton, Florida

Prior to initiating discussions on specific FDEP comments, Mr. Pope opened a discussion regarding the status of the Clear Creek Investigation relative to the identification of the source(s). Mr. Blomberg stated that the source of contamination in the Clear Creek Floodplain is currently unknown. However, he indicated that three possible sources exist: (1) the concrete-lined drainage ditch leading from the NAS Whiting Field southern airfield to the Clear Creek Floodplain; (2) contaminated groundwater discharging to the surface in the Clear Creek Floodplain; and, (3) a buried source (i.e. drums with leaking contamination). The Navy stated that only deep groundwater contamination is currently known to exist at Site 16, the RI site closest to the Clear Creek Floodplain, and that it is unlikely that this groundwater discharges to the surface at the Clear Creek Floodplain. Mr. Adams stated that additional groundwater monitoring is currently underway at Site 16 and that the results of this monitoring program may provide additional information on the source of contamination at the Clear Creek Floodplain.

Mr. Clowes inquired that FDEP wanted clarification whether any private drinking water wells currently exist in the vicinity of the Clear Creek Floodplain site. Mr. Blomberg responded that to the best of his knowledge all residents within one mile of the Clear Creek Floodplain site are on the Point Baker municipal water system.

Mr. Nuzie and Mr. Clowes stated that many of the FDEP comments were adequately addressed through the day's discussion of the USEPA comments and the Navy's responses. Mr. Nuzie and Mr. Clowes only addressed those responses that remained unclear or were found to be unacceptable to FDEP. All other responses were agreed to by FDEP.

Comment 1: FDEP indicated that geophysical sampling of the area to the northwest of the southern beaver pond should occur. Mr. Blomberg stated that this region is covered with 4 to 6 feet of standing water throughout the year, a condition that prohibits magnetometer and other geophysical investigations. FDEP indicated that this is an acceptable rationale for not conducting further geophysical investigations in this region; however, he stated and the Navy agreed that a better explanation regarding the lack of geophysical data in this region should be included in all future reports.

Mr. Bleiler indicated that it is incorrect to continue to refer to this area as a beaver pond. No signs of any recent beaver activity have been observed at the Clear Creek Floodplain site. All parties agreed that future maps will contain better habitat classification nomenclature.

Comment 2: Mr. Clowes indicated that additional sampling should occur in the area to the northwest of the southern beaver pond. The Navy agreed that future investigations in this area will include sediment sampling and screening for Total Petroleum Hydrocarbons (TPH), as well as confirmatory TPH laboratory analysis.

Comment 3: Mr. Clowes stated that the FDEP believes that surface water and sediment samples should be taken from the area immediately downgradient of the concrete drainage ditch discharge. Mr. Blomberg and Mr. Bleiler stated that, based on their familiarity with the Clear Creek Floodplain site, contaminants are unlikely to adsorb to the coarse sandy soils and sediments in this region. The presence of contamination in the floodplain appears to be well correlated with the presence of silty organic floodplain sediments, which generally do not occur at the drainage ditch outfall. However, in response to FDEP and USEPA concerns regarding the region directly downgradient of the concrete drainage ditch, the Navy agreed to collect two sediment samples (one from the drainage ditch outfall sediments and one from the bank of the unnamed tributary near the outfall) from this area and screen them for TPHs. In addition, the Navy agreed to collect one surface water sample from further downstream (above the sediments with the highest TPH contamination) for full scan Contract Laboratory Procedure (CLP) analysis.

Comment 4: Mr. Clowes expressed concerns regarding the presence of contaminants in the Clear Creek Floodplain which may be laboratory contaminants. In particular, he said that acetone and methyl ethyl ketone (both common laboratory contaminants) may actually be present in the site's sediments. The Navy agreed to re-sample locations that had high concentrations of acetone and methyl ethyl ketone, as well as any location that had detected concentrations of dichloroethylene.

Comment 5: Mr. Clowes indicated that a figure is required illustrating the relationship of the Clear Creek Floodplain site to previous surface water and sediment stations with the highest levels of contamination detected in the RI studies. The Navy agreed to include the sampling locations on a figure.

Mr. Pope concluded this section of the meeting with a brief summary of the status of NAS Whiting Field as a future National Priorities List (NPL) site. Mr. Pope indicated that the next opportunity for NPL listing would occur in the spring of 1994, and that the USEPA would like to commence work on the Federal Facilities Agreement (FFA) for NAS Whiting Field prior to NPL listing. Mr. Pope also requested a project managers meeting to take place in February 1994 to discuss the status of the Whiting Field RI/FS. All parties agreed a meeting should take place.

4. Response to FDEP Comments of September 16, 1993 on the Clear Creek Floodplain Investigation Report, NAS Whiting Field, Milton, Florida

Mr. Clowes stated that many of the FDEP comments were adequately addressed through the earlier discussion of the USEPA comments and the Navy's responses. Mr. Clowes only addressed those responses that remained unclear or were found to be unacceptable to FDEP. All other responses were agreed to by FDEP.

Comment 2: Mr. Clowes indicated that a larger map of the Clear Creek Floodplain site would be useful. This map should show groundwater flow direction in the vicinity of the site. The Navy said this map will include the jurisdictional wetlands boundary, as determined in an October, 1993 field investigation.

Comment 2 (cont): Because the levels of contamination in the Clear Creek Floodplain may be harmful to aquatic life and may accumulate in food chains, the FDEP indicated that a biological evaluation is needed at the site. Mr. Bleiler recommended that a tiered approach be used to evaluate risks and impacts to biota from the site. It was agreed that a future ecological risk assessment Work Plan would detail the tiered approach, and that a tiered approach would likely involve comparison of analytical chemical data to existing sediment quality standards, floral and faunal community diversity studies, *in situ* or laboratory bioassays, or bioaccumulation studies. The Navy suggested that it would be more economical to conduct certain studies (e.g., bioassay studies) in conjunction with gathering additional analytical chemistry data on the floodplain sediments.

5. Response to USEPA Comments of September 30, 1993 on the Clear Creek Floodplain Investigation Report, NAS Whiting Field, Milton, Florida

Mr. Pope stated that many of the USEPA comments on the Clear Creek Floodplain site were adequately addressed through the earlier discussion of the USEPA and FDEP comments and the Navy's responses. Mr. Pope only addressed those responses that remained unclear or were found to be unacceptable to USEPA. All other responses were agreed to by USEPA.

General Comments

Comment 1: Mr. Pope indicated that he felt the goals of the Clear Creek Floodplain Investigation were not achieved. As stated in the report, the project goals were "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". Mr. Pope indicated that he believed that the Navy should refrain from making broad statements in future reports. Mr. Adams stated that the goals, as stated, were accurate and that the Navy is attempting to meet these goals. He indicated that even if the Navy is unable to achieve these objectives, the goals are valid. All parties agreed that future documents should contain a statement indicating the status of the on-going investigation relative to the stated goals and objectives.

Specific Comments

Comment 2: Mr. Pope indicated that the ecological characterization is inadequate for assessment of environmental impacts at the site. The Navy agreed and stated that the ecological characterization will be further detailed in the ecological risk assessment for this site. All parties agreed that a comprehensive ecological characterization is beyond the existing scope of the floodplain investigation report, which is intended to be a data summary report, not an ecological risk assessment.

Comment 3: Mr. Pope recommended and all parties agreed that the scale on Figure 2-2 needed to be changed to reflect the easting and northing scale. A revised figure will be included in the responses.

Comment 6: Mr. Pope objected to the use of the term "estimated background concentrations" in the report. He recommended that the Navy should use site-specific background data only. Mr. Blomberg stated that regional background concentrations are no longer used as a standard of comparison.

Comment 13: Mr. Pope requested and the Navy agreed to submit EM-31 profile data in electronic format with the responses.

Comment 16:

Mr. Pope requested and the Navy agreed to add the background sediment sample data to Table 4-2 of the report. A revised Table 4-2 will be included in the responses.

Following the review of the USEPA comments on the Clear Creek Floodplain Investigation, discussion was initiated regarding the USEPA's perceived need for future Draft, Draft Final, and Final documents (rather than the existing two-stage system, which employs Draft Final and Final). Mr. Adams stated that the Navy would prefer to continue with the two-stage approach (Draft Final and Final) and that the three-stage approach is both costly and time-consuming. All parties agreed that the two stage approach would be continued on a trial basis, with the following modifications: (1) the Navy will provide the regulators with a Draft document for conceptual review at the time the draft document is submitted to the Navy; (2) the Navy would respond to any regulatory concerns (including concerns voiced informally through telephone consultation) regarding the Draft document and would incorporate these responses into the Final Draft; (3) the Navy would submit the Final Draft to the regulators for review and comment; (4) the Navy addresses the comments and incorporates the responses into the actual pages of the document and submits the changed pages along with the responses to the regulators; (5) the regulators agree to the changes or a discussion between the Navy and the regulators takes place to come to an agreement for each response in question; and, (6) once all comments have been addressed to the satisfaction of the regulators, the document will go Final. Mr. Adams agreed to prepare a letter from SDIV to the USEPA and FDEP summarizing the proposed approach. In order to finalize Technical Memorandum No. 1, it was agreed that the Navy will submit a comment response package summarizing the regulatory comments and Navy responses.

Prior to adjourning the NAS Whiting Field regulatory meeting several concerns raised by USEPA during a May 20-21 site inspection were addressed. Mr. Blomberg indicated that concrete curbs are currently being scheduled to be installed around those monitoring wells that were installed without bumper posts at the corners of the concrete pad. All curbing is expected to be installed by the end of 1993. In addition, Mr. Blomberg indicated that weep holes have been placed in the surface casings of all monitoring wells at NAS Whiting Field. Mr. Angara stated that two barrels removed from the Clear Creek Floodplain have been disposed of by the installation; according to Mr. Angara, ABB-ES was not involved in the disposal action. Mr. Angara also stated that NAS Whiting Field, and not ABB-ES, was involved in an underground storage tank removal in the vicinity of Site 7. Mr. Adams stated that he would forward any relevant data collected during tank removal to USEPA and FDEP.

The NAS Whiting Field portion of the meeting was adjourned at 15:00 hours. Mr. Clowes and Mr. Nuzie excused themselves and the remaining personnel discussed the Outlying Field (OLF) Barin remedial investigation, in Foley, Alabama.

Mr. Angara inquired about the status of the regulatory review of the OLF Barin Technical Memoranda. Mr. Pope stated that USEPA superiors have instructed him not to review the OLF Barin document, as they are considered a low priority relative to the NAS Whiting Field RI/FS. Since the Navy is the lead agency, Mr. Pope suggested that the Navy and ABB-ES complete the Draft Final RI/FS for OLF Barin and submit it on schedule. Since USEPA will be unable to review this Draft Final document, no Final version will be prepared by the Navy.

The meeting was adjourned at 15:35 hours.