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NAS WHITING FIELD
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LETTER SUBMITTING U S EPA REGION IV REVIEW COMMENTS ON THE TECHNICAL
MEMORANDUM 2 GEOLOGIC ASSESSMENT NAS WHITING FIELD FL
9/21/1994
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

03.01.00.0065

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SEP 21 1994

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Certified Mail
Return Receipt Required

Captain L. K. Tande
Commanding Officer
Naval Air Station Whiting Field
Milton, Florida 32570-5000

SUBJ: Remedial Investigation Phase II-A
Technical Memorandum No. 2
Geologic Assessment
Naval Air Station (NAS) Whiting Field
Milton, Florida

Dear Captain Tande:

The Environmental Protection Agency (EPA) has completed its review of the above referenced document. This review is provided to the Navy under the provisions of Section 120 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). Overall, the document is well done and provides an adequate characterization of the subsurface strata for this phase of the investigation. However, EPA has several comments regarding the presentation and interpretation of data. These comments are addressed in both the General Comments and Specific Comments section of this review document. Comments on the Geologic Assessment need to be addressed by making the necessary changes in the document.

In addition, I would like to convey several observations and concerns which were made known to me by Mr. Craig A. Benedikt of my staff. During his visit to NAS Whiting Field on August 22-23, 1994, it was brought to Craig's attention that a removal of contaminated soil and debris was conducted at Sites 17 and 18. In the spirit of cooperation between EPA and the Navy, I would like to request that a copy of any reports, as well as the supporting documentation, generated as a result of this removal action be forwarded to this office for our records. I would also like to suggest that in the future as additional activities are undertaken by the Navy at NAS Whiting Field; EPA be given the opportunity to review the workplans. Through the submittal of

these documents to EPA, the Navy will not only ensure that EPA is kept abreast of the work being conducted at NAS Whiting Field, but will also ensure that the work being proposed is consistent with the requirements of CERCLA/SARA and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

A second concern raised by Mr. Benedikt involves the disposal of demolition debris in an area across from Sites 9 and 10. During his tour of Sites 9 and 10, Craig observed wetland type vegetation in an area where concrete from the demolition of maintenance hangar aprons was being disposed. EPA recommends that measures be taken to assure that the disposal of maintenance hangar apron debris will in no way have an impact on the wetland area.

If you have any questions regarding these comments, please contact Mr. Craig A. Benedikt, of my office, at (404) 347-3555, ext. 6456.

Sincerely,

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

Enclosure

cc: Jeff Adams, SOUTHNAVFACENCOM

Eric Nuzie, FDEP

Bruce Arnett, FDEP

James Holland, Public Works Division,
NAS Whiting Field

Waynon Johnson, NOAA

John Mitchell, FDEP

Lynn Griffin, FDEP

James Lee, DOI

EPA COMMENTS ON REMEDIAL INVESTIGATION PHASE II-A
TECHNICAL MEMORANDUM NO. 2
GEOLOGIC ASSESSMENT

GENERAL COMMENTS

Overall, the document is well-written and coherent. The Technical Memorandum summarizes the subsurface stratigraphy at NAS Whiting Field by presenting stratigraphic data collected during the Phase IIA RI and consists of lithologic logs of subsurface soil samples obtained from soil borings. Furthermore, the Technical Memorandum includes a series of cross sections to portray the lateral continuity of the stratigraphic units.

The three objectives of the Phase IIA RI were to characterize vadose zone and saturated zone soils, map local clay layers and characterize the soil stratigraphy between the Industrial Area and the Southwestern Disposal Area. There is adequate data to meet these three objectives, and both the lithologic data and the cross sections are well designed and readable. The Technical Memorandum acknowledges that the continuity of some of the clay horizons cannot be verified because many of the soil borings are too shallow. However, the addition of deeper borings to confirm clay horizon continuity does not appear to be necessary at this stage. Since no analytical data are available as yet, it would be premature to expand the geological database. Additional stratigraphic data should be collected only if analytical results indicate that the investigation of soil stratigraphy in selected areas is necessary to improve the understanding of contaminant fate and transport mechanisms or to estimate the extent of contamination.

The interpretations presented in the Technical Memorandum are reasonable and conservative. For example, the Technical Memorandum does not excessively extrapolate the horizontal extent of clay layers beyond known data points. The possibility that these clay layers extend further than shown on the cross sections is acknowledged in the text, but this potential is not depicted on the cross sections. This conservative approach is appropriate.

It should be recognized that all of the stratigraphic data presented in the Technical Memorandum is based on visual observation and therefore subject to inaccuracies resulting from subjective judgment. It would be useful to present in the Technical Memorandum a comparison of the borehole geophysical data developed in Phase I with lithological data from visual

examination developed during Phase IIA. Although the geophysical data is also subject to interpretation, it is generally more reproducible. The comparison would yield a measure of confidence in the reliability of the visual descriptions.

SPECIFIC COMMENTS

1. Page 1-4, Paragraphs 2 and 3:
Remove any reference to the HRS II. The HRS although revised to better assess relative risk was not renamed. Therefore, refer to the scoring model as simply the HRS.
2. Page 1-10, Table 1-2:
According to previous information, JP-5 was the type of material disposed of at Sites 17 and 18. Revise the table to reflect that JP-5 was disposed in these areas, not JP-4. In addition, make the change to the Notes section at the bottom of the page.
3. Page 3-6, Figure 3-4:
Site 31B as located on the map east of Site 16 should be labeled as Site 31A.
4. Page 3-10, Figure 3-8:
The North Field Runway/Taxiway should be labeled as the South Field Runway/Taxiway.
5. Page 3-27, Paragraph 5:
In the second to the last sentence, make the word boring plural to agree with the subject.

AUGUST 22-23, 1994 - SITE VISIT COMMENTS

1. During the site visit, it was brought to EPA's attention that a removal action took place at Sites 17 and 18 to remove contaminated soil and debris. EPA requests that a copy of the data and/or report generated as a result of the removal be provided for incorporation into the site's file. In addition, EPA requests that future workplans be submitted to Region IV for review to ensure that statutory requirements are being met.

2. During a visit to Sites 9 and 10, EPA observed that a wetland area exists across the perimeter road from the sites. In addition, the area where the wetland is located is being utilized by the facility for the disposal of construction/demolition debris. EPA recommends that precautions be taken to prevent an impact to the wetland area from the disposal of construction/demolition debris.