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NAS WHITING FIELD
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LETTER REGARDING REVIEW COMMENTS ON DRAFT TECHNICAL MEMORANDUM 3
SOILS ASSESSMENT NAS WHITING FIELD FL
12/21/1994
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protec

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Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

December 21, 1994

Mr. Jeff Adams, Code 1859
SOUTHNAVFACENGCOM
2155 Eagle Dr., P.O. Box 190010
North Charleston, SC 29419-9010

RE: RI/FS, Phase IIA, Draft Technical Memorandum No. 3, Naval Air Station Whiting
Field, November 1994

Dear Mr. Adams:

The Department has reviewed the draft Technical Memorandum and specific comments are provided to the Navy in the attached table. In general, the document is an adequate compendium of raw information collected during the soil investigations. I believe, however, that the TM would be more useful in the long-run if it presented the soil data within a larger-scale context that included the assumed site models. The TM would also be improved by presenting conclusions that supported or modified the assumed site models. Recommendations for future actions would also be useful. This approach could be used as a model for future TMs that address other media and migration pathways as well. This would make integration of other elements in the RI more effective and efficient. The end product would be a set of compatible media-specific TMs with consistent conclusions and recommendations that could be easily compiled into an RI report.

As presented, the TM has little context beyond a simple organization of soil data. If the intent of the TM is just that, then it is not a decision document and the Department's review comments are for your information only. The Department appreciates the opportunity to review these data and the Navy can produce the TM unilaterally for their own purposes upon USEPA concurrence. The Department looks forward to receiving the draft RI/FS report that presents conclusions and makes recommendations. If you have any questions, please call me at (904) 488-3935.

Sincerely,

Gregory M. Brown, P.E.
Professional Engineer II
Technical Review Section

GMB/gmb
encl (1)

cc: Jim Holland, NAS Whiting
Craig Benedikt, USEPA Region IV
Robin Futch, ABB-ES
John Mitchell, FDEP

TJB *JJE* JJC *JJE* ESN ESN

No	Page/Paragraph	Comment
1	General	<p>The TM does not describe the soil sampling and analysis with in the content of postulated site models. What are the objectives of the soil sampling for each site and what data are required to confirm the site models? How does possible soil contamination relate to other contaminated media and migration pathways? This information is probably in the work plan and SAP if there is one; however, the TM appears to be untethered by a work plan or SAP. This apparent lack of context is an important flaw that should be corrected in the final document.</p> <p>The results are compared to presumed background concentrations and CRQLs or CRDLs. This may be acceptable at this stage of the project as a rough assessment of soil contamination in order to identify a simple ordinal ranking of "not so dirty" to "very dirty". When the Navy is ready to analyze the data fully, however, consensus on background values will be required, ARARs will be identified, and protective risk-based concentrations will be calculated, if necessary.</p> <p>Note that the Department has developed Soil Cleanup Goals for selected chemicals that it considers to be minimum values for site assessment and cleanup unless other values are approved. Selection of analytical methods and detection limits in the future should consider Department Soil Cleanup Goals to the extent practicable. (There are Soil Cleanup Goals for a subset of constituents that are below MDLs for approved analytical methods. In these cases, the MDL or site-specific background value may be substituted for the Soil Cleanup Goal with approval from the Department.) Although ground water is not addressed by this TM, the Navy should also be aware of the Department's Ground Water Guidance Concentrations.</p> <p>At the other end of the report, the results and findings section simply presents the sifted data without any analysis. How do the data support or change the site models? How does detected contamination relate to other media and migration pathways (e.g., surface water)? Are the data gaps adequately filled so the Navy can begin to make site management decisions? Does the Navy need to collect more data? Are there opportunities for implementation of early actions to reduce risks at specific sites? The results and findings section should provide <u>conclusions</u> that begin to address these types of questions consistent with the work plan and SAP goal and objectives.</p>
2	xsum/pg iii	Typo: "Crash that Crew Training Areas."
3	Section 1.0/pg. 1-1	Identify the work plan that the various field activities are based on and briefly summarize its scope of work.
4	Section 2.0/pg. 2-1	Bulleted items: what is the difference between: "• subsurface soil sampling," and "• soil borings and subsurface soil sampling."
5	Section 2.2/pg. 2-3	<p>"The background surface soil samples were collected from locations that were not likely to be affected by past or present waste disposal practices."</p> <p>Please identify the "present waste disposal practices" referred to. If these are unpermitted, uncontrolled disposal practices, the Navy should take immediate action to correct them.</p>
6	Section 2.4/pg. 2-22	Reference to "ABB-ES, 1993b" is incorrect. The actual document being referred is Technical Report, Soil Gas Survey, March 1993, I think.
7	Section 2.5.2/pg 2-30	<p>"... because they are being assessed under the Navy UST program."</p> <p>In general, the Department recommends to the Navy that the IR and UST programs at Whiting coordinate their technical activities to the extent possible in order to maximize the value of their mutual environmental monitoring data. Data from one program may enhance the other and prevent duplication of effort and expense.</p>

8	Section 3.1.2/pg. 3-2 and Section 3.1.3/pg. 3-3	Briefly define a "field event" and "matrix" for QA/QC purposes.
9	Section 3.3.4/pg. 3-23	Narrative says "...greater than 90 percent..." and table 3-3 indicates "> 95" completeness. Were there any key samples where data was rejected regardless of the overall data completeness?
10	Section 3.4	Narrative says "Some contamination was present in some of the field laboratory blank samples, and environmental results were amended to reflect this bias." Please explain "results were amended". According to EPA and NEESA guidelines for data validation, results may not be corrected by subtracting any blank values. Perhaps you are referring to the 5X or 10X rules?
11	Section 3.0	Note that the CLP CRQLs and CRDLs for water reported in this section are higher than Florida Ground Water Guidance Concentrations for some constituents.