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NAS WHITING FIELD
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LETTER AND COMMENTS FROM U S EPA REGION IV REGARDING TECHNICAL
MEMORANDUM FOR REMEDIAL INVESTIGATION PHASE IIA FOR SOIL ASSESSMENT
NAS WHITING FIELD FL
3/2/1995
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION

REGION 4

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

MAR 02 1995

4WD-FFB

Certified Mail
Return Receipt Required

Mr. Jeff Adams
Code 1859
Southern Division, Naval Facilities
Engineering Command
2155 Eagle Dr.
P.O. Box 190010
North Charleston, SC 29419-9010

SUBJ: Remedial Investigation Phase II-A
Draft Technical Memorandum No. 3
Soils Assessment
Naval Air Station (NAS) Whiting Field
Milton, Florida

Dear Mr. Adams:

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). However, EPA has various comments regarding the presentation of data, interpretations of data, and the conclusions based on those interpretations. You will find the comments enclosed with this letter. Comments on the Soils Assessment need to be addressed by making the necessary changes in the document.

If you have any questions regarding these comments, please feel free to contact me at (404)347-3555, ext. 6456.

Sincerely yours,

Craig A. Benedikt
Craig A. Benedikt
Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: James Crane, FDEP
James Holland, Public Works Division,
NAS Whiting Field
Waynon Johnson, NOAA
John Mitchell, FDEP
Lynn Griffin, FDEP
James Lee, DOI

TECHNICAL REVIEW AND COMMENTS REPORT
DRAFT REMEDIAL INVESTIGATION AND FEASIBILITY STUDY PHASE IIA
TECHNICAL MEMORANDUM NO. 3
NAVAL AIR STATION WHITING FIELD
MILTON, FLORIDA

GENERAL COMMENTS

1. ABB generated a tremendous amount of data in support of the facility-wide soil assessment project, yet the summary portions of the Draft Technical Memorandum should include information from all investigative activities. Conclusions based upon the logical interpretation of data should also be provided.
2. The Summary and Conclusions (Section 5.0) provides an abbreviated site-by-site summary of findings. This section should provide a narrative description of how the data impacts future RI activities and site prioritization. Presentation of this information is important to augment the understanding of soil contaminant levels at the different sites across the facility and to focus any additional soil investigative efforts where needed most.
3. Background environmental media samples should always be obtained for each media type sampled. In the case of soils, a surface and subsurface soil sample should be obtained for each of the soil types identified at the NAS Whiting Field facility. The Draft Technical Memorandum provides a well-documented surface soil background establishment process; however, no subsurface soil background establishment procedures or data is identified for sites 3, 6, 18, 29, 30 and 33. ABB identifies the lack of background subsurface data for these sites in Section 5.0 of the Draft Technical Memorandum. Background subsurface soil characteristics should be established to facilitate equitable comparison of sites.
4. The field investigative methods conducted under the Phase IIA soil assessment included geophysical and soil gas surveys, the results of which are presented as appendices A and C, respectively. These survey results are provided as separate documents; however, the information should be combined with findings from the test pit sampling activities for the corresponding sites in the site-specific summary within the Draft Technical Memorandum. Conclusions should be made as to the relevance of the combined data gathered to date.

SPECIFIC COMMENTS

The specific comments are listed on the following pages in the order of occurrence and are organized according to the page, paragraph, section and figure or table number, as appropriate.

1. Page 1-17, Paragraph 2:
The last sentence of this paragraph states that the decision to return Sites 4 and 7 to the IR program is still pending when in fact the decision has already been made to do so. Please revise.
2. Page 1-18, Bulleted Item 2 (Top of Page):
The identification of lithologic characteristics of soil in both the vadose zone and the sand-and-gravel aquifer within the facility is listed as one of three objectives of the RI Phase IIA soil investigation. However, no data is presented which indicates this objective was met. The soil types identified in the Draft Technical Memorandum should include descriptions and depths of occurrence within the sand-and-gravel aquifer. The text does not mention the lithologic characteristics for the sand-and-gravel aquifer. If this information exists as part of Technical Memorandum No. 4 (Hydrogeologic Assessment), the objective of the soil investigation should be amended or explained accordingly.
3. Page 2-18, Paragraph 1 and Page 2-19, Table 2-3:
The last sentence of this paragraph states that background surface soil samples were analyzed for TCL pesticides, PCBs, PAHs, and TAL inorganics; however, the samples were not analyzed for TCL VOCs nor SVOCs. In order for a proper comparison of analytes detected in background samples versus those detected in environmental media samples to be made, all background samples should be subjected to the same analytical protocols as the environmental media samples. In addition, without subjecting the background samples to the same analyses as the other source samples, no distinction can be made between contamination related to site activities with contamination related to other activities not related to the site.
4. Page 2-22, Paragraph 4:
Given the reported disposal of thousands of gallons of JP-4 at Site 9, it would have been extremely useful in the investigation if Site 9 had been included in the passive soil gas survey using the Petrex method.
5. Page 3-12, Section 3.3:
The statement is made that all samples were analyzed for TCL VOCs, SVOCs, pesticides, PCBs, TAL metals, and total cyanide. However, as stated previously, background samples were not subjected to the full suite of analyses. Specifically, background samples were not analyzed for TCL VOC analytes. What was the rationale as to why background samples were not subjected to TCL VOC analysis?
6. Page 2-27, Paragraph 2:
The text states that the termination depth of soil boring samples for laboratory analysis was determined by Organic Vapor Analyzer (OVA) readings above ambient air readings; however, there is no mention of OVA air monitoring results during soil boring and sample collection

activities. At a minimum, a general statement regarding the impact, if any, the OVA air monitoring results had on determining the soil boring sample depths should be provided. A reference to the location of OVA air monitoring results should also be provided.

7. Page 4-18, TCL SVOCs Section:
Why wasn't bis(2-ethylhexyl)phthalate analyzed for in the background soil sample analyses?
8. Appendix C, Soil Gas Survey:
The text is missing page 3-2 and figures 3-6, 3-15 and 3-16. The text and figures should be provided.
9. Appendix C, Soil Gas Survey, Page 3-1, Paragraph 3:
The text references Appendix B for original ion count results for each sampler located at the various sites included under the soil gas survey. The referenced Appendix B was not contained within the documents provided. A corrected reference or appropriate appendix information should be provided.
10. Page 4-72, TCL SVOCs Section:
Why was naphthalene the only target compound analyzed for in the background soil samples?
11. Page 4-74, TCL SVOCs Section:
Why weren't 4-methylphenol and bis(2-ethylhexyl)phthalate target analytes in the background soil samples?
12. Page 4-87, Pesticides and PCBs:
The three pesticide compounds were detected above the CRQLs. Why were the detected concentrations qualified as estimated?
13. Page 4-91, TCL VOCs:
State the concentrations of TCE detected in the four subsurface soil samples in the body of the report.
14. Page 4-150, TAL Metals Section:
The text states that some of the analytes detected were done so at concentrations both above and below CRDLs. This paragraph is ambiguous. Please clarify.
15. Page 5-2, Section 5.3:
Why were surface and subsurface soil samples not collected at Site 9 during the soils assessment? Until the reported disposal of thousands of gallons of JP-4 can be refuted through the analysis of surface and subsurface soil samples, the Agency will not agree to closing this site out.
16. Page 5-7, Bulleted Item 3 (Bottom of Page):
Why haven't background subsurface soil samples collected or identified for this assessment? See comment No. 3 under the General Comments Section above.

TYPOGRAPHICAL/GRAMMATICAL COMMENTS

1. Page 1-18, Paragraph 4, Sentence 2:
The subject and verb in this sentence do not agree. Please revise.
2. Page 2-20, Paragraph 2, Sentence 3:
The word coordinates should not be hyphenated.
3. Page 4-24, TCL SVOCs Section:
The word remain should be changed to remaining in the third sentence.
The word analyze should be changed to analyte in the last sentence.
4. Page 4-24, TAL Metals Section:
The word contractions in the second sentence should be concentrations.
5. Page 4-140, Paragraph 1:
Insert the word the in between the words of and samples at the end of the second sentence.