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NAS WHITING FIELD
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LETTER AND FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS
TO TECHNICAL MEMORANDUM NUMBER 7 FOR REMEDIAL INVESTIGATION/FEASIBILITY
STUDY WORK PLAN PHASE IIB NAS WHITING FIELD FL
5/16/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

09.01.00.0069

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Virginia B. Wetherell
Secretary

May 16, 1995

Mr. Jeff Adams
Code 1859
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
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North Charleston, SC 29419-9010

file: wh_tm7.doc

RE: RI/FS Technical Memorandum No. 7, Phase IIB Workplan, Naval Air Station Whiting Field, Milton, FL

Dear Mr. Adams:

I have reviewed the subject document dated March 1995 (received March 31, 1995) and offer the following comments:

1. Table 5-1 should be modified to produce a new (additional) summary table to include aspects of the proposed investigative sampling. An example would be to include additional columns for soil gas surveys, new monitoring wells, etc. This table should then be included in Chapter 7.
2. I understand that during future ground water sampling events, if the ground water turbidity is >5 NTUs, both filtered and unfiltered samples for inorganic constituent determinations will be obtained. My preference, as we have previously discussed, is that the Navy strive to obtain relatively undisturbed (non-turbid - and consequently, unfiltered, samples); in the absence of this, however, the alternate procedure is acceptable.
3. On page 2-4, in the penultimate paragraph it is stated that the ground water in the eastern half of the installation is flowing to the southeast toward Big Coldwater Creek. While this may be true, the flow contours on Figure 2-1 do not really agree with the statement. What is the correct direction of ground water flow?

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4. Figure 2-2 is constructed at a scale, and is a type of presentation (simply modified from a pre-existing figure), that is not useful for understanding the actual well locations. I suggest that this figure encompass an area 5 miles on a side and include physical features such as communities and roads. Additionally, the locations of the base production wells should be shown on a separate map constructed at a workable scale so they can be correlated with other base features. These wells should also be included on other appropriate figures whenever they are within an area of contamination. Production rates and physical parameters for these wells should also be obtained and be readily available in the various reports presented for the Navy.
5. Does the Navy intend to sample the nearby private wells (page 2-8)? What about wells east of the base boundary? Will the well inventory data be presented as part of this investigation?
6. Page 3-4 refers to O.U. 7, The Clear Creek Flood plain; the report also clearly states that it has not been assigned a site number. Should the designation, at this time, of "Proposed Operable Unit 7" be used to lessen confusion?
7. Page 4-1 refers to the QAPP as "E.C. Jordan, 1990." Should this reference be updated or referenced to the newer ABB-ES QA documents?
8. Section 4.2 discusses the BAT and other DPT (direct push technology) to be used in the study. Please insure that adequate equipment blank procedures are in place before these techniques are employed so that contamination of the type being investigated at the site is not duplicated or added to by sampler components. Additionally, when such data are presented, please utilize a tabular format which shows the ground water surface and the sampling zone for the samples. The reasons for this are illustrated on page 5-4, RI Phase I Investigation; I cannot tell from the presentation where (in the aquifer) the (contaminated) sample was obtained.
9. On page 7-19, three existing wells are proposed for sampling. Only two wells are shown on Figure 7-7; where is the third well?
10. On page 7-28, In Situ Ground Water Sampling, it is stated that sampling will occur at hydraulically upgradient and downgradient sites. Assuming that the ground water direction in Figure A-4 is correct, it appears that the upgradient direction is not proposed for sampling (Figure 7-8). Please revise this figure.
11. On page 7-29, a new monitoring well is described for Site 14. Please show the location of this well on Figure 7-8.

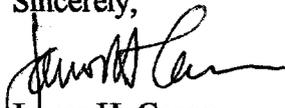
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12. On page 7-30, Section 7.4.1 lists Site 21C twice - make one of them Site 21D.
13. I am aware that the USGS will be employed to construct a ground water computer model for the facility. I generally favor such a method for understanding the overall relationships of the water and the movement of contaminants. I strongly suggest that the Navy delineate very clearly it's needs and what it expects from such a study. This way, omissions and duplications may be reduced or eliminated. I hope that we in the agencies participating in the site investigation will be allowed to review the proposed program.

Although many of my preceding comments are specific in nature, my overall goal in the project is to help produce reliable information that may be used in the decision-making process. Data that are easily accessed in tabular or graphic form makes the process much easier; therefore, whenever possible, I would prefer to see these forms of data presentation. Ground water modeling, when presented in a straightforward and understandable manner, will also contribute greatly to our understanding of the facility.

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 488-3935.

Sincerely,



James H. Cason
Remedial Project Manager

cc: John Mitchell, FDEP Natural Resource Trustee
Craig Benedikt, USEPA Atlanta
James Holland, Naval Air Station Whiting
Jerry Walker, ABB Tallahassee

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