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NAS WHITING FIELD
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING FINAL DRAFT REMEDIAL INVESTIGATION REPORT SITE 31 SLUDGE DRYING BEDS AND DISPOSAL AREAS NAS WHITING FIELD FL
11/30/1998
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA

Department of Environmental Protect...

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Kirby B. Green, III
Secretary

November 30, 1998

Ms. Linda Martin
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, SC 29419-9010

file: 31rfi_1.doc

RE: Final Draft Remedial Investigation Report, Site 31, Sludge Drying Beds and Disposal Areas, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated October 1998 (received October 6, 1998). In preparing the final draft, the Navy should adequately address the following comments:

1. An Executive Summary would improve the document.

2. Figures 2-2 and 3-2 (and perhaps others) should be revised to show enough detail to enable a reviewer to understand the character of the sites. For instance, Site 31C extends beyond the delineated boundary (Figure 3-2) in at least one place. The most notable site characteristic, a deep ravine, is not shown; this should be shown, including the area extending down gradient to Clear Creek, since overland flow could easily be a dominant characteristic of the site and on the contaminants which were discharged on the surface of the site. Finally, there are areas at Site 31C which contain numerous pine trees; is this within the site? Additionally, a large area of sludge emplacement is shown to extend beyond the boundary of the site. Is there a reason for extending the contaminated area beyond the supposed site boundary? Please depict the site correctly on the revised figures; even better, include a larger scale figure for Site 31C.

3. In Section 2.2 the presence of a rubble pile in the southwest area of Site 31C consisting of concrete, asphalt and metal is described; Figure 3-2 shows a rubble pile southeast of the indicated site. Where is the southwest rubble pile and, were samples obtained near or in the vicinity of the pile?

4. Soil Sampling: it is difficult to determine the location of subsurface soil sampling points. Please prepare a table and associated figure (if a larger scale figure is prepared subsequent to comment #2, it may be suitable) which depicts and describes the surface and subsurface samples, their depths and other information, or at least modify Figure 3-2 to note that surface soil sample locations 31B006, 31B007 and 31B008 are also locations of

subsurface soil locations at Site 31C. It seems that in any case, since an IM is planned for Site 31C, better site maps are in order.

5. Please justify why, of the six separate sites that comprise Site 31, ground water was sampled only at Site 31C. Include in that justification the high detection limits, notably those above TCLs.

6. As we have previously discussed for other sites at NAS Whiting Field, please insure that the soil, surface water and ground water data are evaluated with respect to the soil, surface and ground water (Table 3b) values in Chapter 62-785, F.A.C. Please note that the evaluation for soil should be the lower of either the direct exposure I or the appropriate leachability level, if ground water is indicated to be contaminated. Please modify the appropriate tables to reflect this change. Please reevaluate the existing COPC, risk evaluations, etc., as necessary to also reflect this change. Finally, the outdated Soil Cleanup Goals Memorandum from Mr. John Ruddell and the memorandum from Ms. Ligia Mora-Applegate dated April 5, 1995 should not be used. Use of the TCLs from Chapter 62-785, F.A.C. will eliminate the errors such as those seen in copper, vanadium (and others) in Table 5-7, and others.

7. As related to the previous comments, I am having difficulty understanding how Table 5-24 should be interpreted. There are six sets of sampling data presented; one is duplicated and one was a filtered sample. In order to properly evaluate the soil contamination, one must refer to the ground water samples in order to determine if the leachability values are applicable. In many of the ground water sample data sheets in Appendix C, many of the detection limits are above the State TCLs; however, those data are reported in Table 5-24 as non-detects, leading to erroneous conclusions. As an example, the detection limit for benzene was 10 ug/L, which was reported as non-detect. This is in error, since the State ground water TCL is 1 ug/L; hence, the ground water data are insufficient to characterize the site, especially since the ground water only at Site 31C was sampled. We need to discuss this problem and reach agreement as to how the Navy can reconcile it. In a manner similar to the preceding example, all data and resulting conclusions should be reconciled for appropriate adequacy.

8. Section 3.1 and Figure 3-2: a method of surface soil sampling is described with respect to two distinct phases and a "random" sampling method is described. Inspection of sample points on Figure 3-2 seems to indicate very little, if any, random sampling at Site 31C. Please discuss the sampling regime at this site in enough detail to enable the reviewer to understand the method and results. In addition, please indicate the locations of the subsurface soil samples. Finally, discuss and justify why the Navy feels that the site has been adequately characterized. In all the previous aspects, remember that comment #2 potentially enlarged the site boundaries, including down to Clear Creek and the apparent lack of adequate ground water data, given the few number of samples and the preponderance of high detection limits.

9. Human Health Risk Assessment, Section 6.0: Please correct the errors in the FDEP risk level on Figure 6-4. Please insure that the tables and information in this section reflect the use of Chapter 62-785, F.A.C.

10. Please reconsider the conclusions and recommendations in Section 9.0, based on the use of Chapter 62-785, F.A.C. for site evaluations.

If you have any questions or need further clarification, please feel free to contact me at 850-921-4230.

Sincerely,

James H. Cason, P.G.
Remedial Project Manager

cc: Craig Benedikt, EPA Region IV, Atlanta
Jim Holland, NAS Whiting Field
Rao Angara, HLA, Tallahassee

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