N60508.AR.000971
NAS WHITING FIELD
5090.3a

LETTER REGARDING DRAFT INTERIM REPORT ADDENDUM INDUSTRIAL GROUND WATER INVESTIGATION NAS WHITING FIELD FL
2/24/1999
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

09.01.00.0089
00397

# Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

February 24, 1999

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: gw_indus.doc

RE: Draft Interim Report Addendum: Industrial Ground Water Investigation, NAS Whiting Field

Dear Ms. Martin:

I have reviewed the subject document dated October 1998 (received October 22, 1998). The purpose of the report is to help document available ground water data from selected areas of NAS Whiting Field. In addition, Section 1.0, Introduction, states that the purpose of the document is also to document the nature and extent of the ground water contaminants in those areas. Please address the following comments in the final document:

1. In the absence of adequate maps or graphic presentations, the extent of any chemical compounds cannot be determined.

2. Section 1.0, paragraph 3: Please confirm that it is the intention of the Navy that the data in this report will be presented in the various site RI reports. I'm not sure that the information in this paragraph is accurate.

3. The data presentation does not include data from UST sites. Please address this apparent deficiency or, will the basewide ground water investigation address it?

4. Figures: The report discusses five separate areas at NAS Whiting Field, yet only the Clear Creek area is delineated and the location of the other areas cannot be determined. A figure (or figures) should be presented for the other areas. The figures should include the location of the various contaminants (for lateral determination of contamination) and data on the well depths so that the vertical contaminant extent can be addressed.

5. Figure 2-2: The figure indicates sample locations WHF-39-W009 through WHF-39-W011. However the data is not provided in Appendix A. Please provide those data.

6. Page 3-2, section 3.3.1: The explanation of sample identifiers does not explain the occurrence of D and F in the sample designations. Please elaborate on their meaning.

7. Page 3-8 section 3.3.5.1: This paragraph states that eight VOCs and 10 metals were detected in surface water samples; however, the text does not indicate which compounds were detected. The report also does not include the Florida Class III fresh water criteria to which the detected concentrations were screened. The report also only references State of Florida screening criteria and does not include USEPA screening values. Please prepare a summary table(s) showing those values

8. Figure 2-2: The figure indicates sample locations WHF-39-W009 through WHF-39-W011. The data are apparently not provided in Appendix A. Please provide those data. Similarly, in Appendix A Table A-1, water quality parameters for Clear Creek surface water and ground water within the creek bed are not provided. Please include these in the Table. Additionally, in Appendix A Table A-1, turbidity measurements for the ground water sample are not included in the table or elsewhere in the report. Please include them.

9. Page 2-3 Fifth paragraph: The field screening parameters listed in the text do not match the parameters listed in Table A-1. Some of the parameters listed as field screening methods are included in the offsite laboratory data. In addition, what are the "other natural attenuation parameters?" Please list them.

10. Page 2-3 Section 2.4.1: The sampling methodology for Clear Creek surface water and ground water are not detailed. Since the methods are "non standard," they should be explained.

11. Page 3-9 section 3.3.5.1: It appears that Clear Creek sediment samples were screened against Florida Class III freshwater criteria instead of sediment values. Surface water should not be compared to sediment values. Please correct this statement.

12. Please include the construction details, well completion depths or monitoring well lithologic logs for the new monitoring wells (i.e. WHF1466-8S, 8I, 8D; WHF 1466-22S, 22I, 22D and WHF 30-3D) installed during the investigation.

13. The report should discuss and present the screening data information, including the appropriate references to Chapter 62-785, F.A.C., the MacDonald Sediment Screening data and the similar data for Federal standards.

14. In the references, the correct date of the General Information Report is 1998, not 1997. Additionally, please include references for Chapter 62-785, F.A.C. and the MacDonald report regarding sediment screening.

I appreciate the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-4230.

Sincerely,

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

cc: Craig Benedikt, USEPA Atlanta
Rao Angara, HLA, Tallahassee

TJB JRC for JJC JJC ESN ESN