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NAS WHITING FIELD
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LETTER REGARDING THE TRANSMITTAL OF THE RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING REVIEW COMMENTS ON THE DRAFT REMEDIAL INVESTIGATION FEASIBILITY STUDY WORK PLAN FOR SITES 7, 29, 36, 38, 40 PSC 1485C NAS WHITING FIELD FL
2/24/2000
TETRA TECH

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February 24, 2000

Project Number 0052

Mr. Jim Cason
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399

Reference: Clean Contract No. N62467-94-D-0888
Contract Task Order No. 0079

Subject: Response to FDEP Review Comments - Draft Remedial Investigation and Feasibility Study Work Plan for Sites 7, 29, 36, 38, 39, 40, and PSC 1485C Naval Air Station Whiting Field, Milton, Florida

Dear Mr. Cason:

On behalf of Southern Division, Naval Facilities Engineering Command, Tetra Tech NUS, Inc. is pleased to submit the Revised Response to Comments for the Draft Remedial Investigation and Feasibility Study Work Plan for Sites 7, 29, 36, 38, 39, 40 and PSC 1485C at Naval Air Station Whiting Field, Milton, Florida. The final edition of this document will be renamed as follows "Final Remedial Investigation and Feasibility Study for Sites 5, 7, 29, 35, 38, 39, 40 and PSC 1485C Naval Air Station Whiting Field, Milton Florida". Revisions to the Response to Comments are a result of discussions during the January 18, 2000 NAS Whiting Field Partnering Team meeting. Copies of this document are also being forwarded to members of the NAS Whiting Field Partnering Team.

If you have any questions, please give Terry Hansen or myself a call at (850) 385-9899.

Sincerely yours,

Gerald Walker

Gerald Walker, P.G.
Technical Lead

GAW/gaw
Enclosure

c: Linda Martin, SDIV
Craig Benedikt, EPA (electronic copy)
Jim Holland, NAS Whiting Field (electronic copy)
Pat Durbin, NAS Whiting Field (electronic copy)
Tom Conrad, BEI (electronic copy)
Terry Hanson, TtNUS (electronic copy)
Rao Angara, HLA (electronic copy)
Amy Twitty, CH2M Hill (electronic copy)
File/0052

Text in italics are additions to the original Response to Comments based on discussions with the original parties commenting, during the NAS Whiting Field January 18, 2000 Partnering Team meeting.

Response to FDEP Comments on
Remedial Investigation and Feasibility Study Work Plan for
Sites 7, 29, 36, 38, 39, 40, and PSC 1485C
April 1999

1. Please prepare a supplemental section, which addresses the PCB contamination at Site 5 (which has been previously assessed for battery-related contaminants but not for PCBs).

   Response: Additional text will be added to the document, which summarizes the proposed investigation at Site 5.

2. Please utilize the GCTLs and SCTL in Chapter 62-777, F.A.C. for the analytical constituent assessment, remembering to evaluate the leaching for soils irrespective of whether or not analytes are found in groundwater, which exceed specific GCTLs. Additionally, when there are instances where subsurface soil exceeds the SCTLs for a residential direct exposure scenario, these should be noted and taken into account when making site recommendations

   Response: The GCTL and SCTLs in Chapter 62-777 will be used in the data assessment of the RI report.

3. Figures 2-3 and 2-4: Please clarify how the ground water elevations in the water table (figure 2-3) and the deep zone (Figure 2-4) seem to have the (almost) identical elevations, which seems to be incorrect given that the elevations are in NGVD.

   Response: The source of the indicated figures was Technical Memorandum No. 4, Hydrogeologic Assessment for NAS Whiting Field completed by ABB-ES in 1995. The figures were regenerated without interpretation. The data used in the figure will not be reviewed at this time, however, data collected during the upcoming investigation will be contoured and new groundwater flow maps will be generated.

4. Tables 2-1, 2-2, 2-3, and 2-4 and others need to be evaluated with respect to their replacement on the pages (the bottom portion of a table is generally opposite the binder, not as many of the tables in the document are presented.

   Response: The tables will be modified for presentation in the final document.

5. Section 2-6, page 2-20: while I agree to some degree, I cannot subscribe without reservation to the statement that, "This proposed approach recognizes that complete site characterization is not possible or necessary and, therefore, the remaining uncertainties must be managed." I must reserve the right to require characterization to the degree that I am satisfied that the data produced in this investigation are sufficient for the adequate evaluation of the extent of contamination and for the protection of human health and the environment.

   Response: Comment noted. As the investigation progresses, program updates will be presented to the NAS Whiting Field Partnering Team. These updates will allow early identification of site

characterization uncertainties or data gaps, which can then be addressed before the conclusion of the investigation. The site characterization will be completed to the extent necessary for approval of the final Record of Decision.

6. Much of Clear Creek Floodplain is composed of sediments, as opposed to soils, which are occupied by specialized flora and fauna. How will these be evaluated? Does the Navy plan to include or provide for biological sampling of the system? I think it is important that we do, especially since Clear Creek represents a unique ecosystem occupied buy specially adapted organisms.

   Response: As indicated in Section 5.2, An Ecological Risk Assessment will be preformed to characterize the potential risks from base-related chemicals to ecological receptors in the Clear Creek area. The ecological risk assessment includes (Section 5.2.2.1) preliminary problem formation which begins with a description of the site, it ecological setting (habitat types) and the ecological receptors that are or could be present. A site visit will be conducted by project ecologists to obtain the necessary information for this step. Maps of the habitats will be generated that characterize the habitats present. Plant communities will be identified and classified according to the Florida Natural Areas Inventory (FNAI) habitat classifications (FNAI, 1990).

   All of these activities, from the planning stages forward will be discussed and coordinated with natural resources personnel for NOAA. Comments and concerns will be sought prior to the initiation of the ecological fieldwork investigation.

7. The Navy should consider presenting the results of the Site 40 investigation as a separate document. I say this because it is a base wide study that encompasses sites other than sites 7, 29, 36, 39, and PSC 1485C and will probably be finally completed long after the other sites are complete. It may be that the remaining sites would be presented separately, as required.

   Response: The comment will be considered and an evaluation will be made once the investigation is in progress.