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NAS WHITING FIELD
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LETTER AND U S NAVY RESPONSE TO COMMENTS TO FINAL REMEDIAL ACTION
DECISION DOCUMENT SITE 22B OLD FIRE FIGHTER DEMONSTRATION AREA BARIN
NAS WHITING FIELD FL
8/8/1996
ABB ENVIRONMENTAL



07541-094

August 8, 1996

Mr. David Thompson
Alabama Department of Environmental Management
Special Projects
1890AA Congressman W. L. Dickinson Drive
Montgomery, AL 36109

SUBJECT: Final Remedial Action Decision Document, Site 22B
Old Firefighting Demonstration Area
Outlying Landing Field (OLF) Barin, Foley, Alabama
Contract No. N62467-89-D-0317/031

Dear David:

On behalf of Southern Division Naval Facilities Engineering Command and Jeff Adams, Engineer-in-Charge, ABB Environmental Services, Inc. (ABB-ES) is pleased to submit the Final Remedial Action Decision Document for Site 22B. Attached, please also find the responses to both ADEM's and SDIV's comments to the Draft.

If you have any questions concerning this document or the project in general, please contact me at (904) 656-1293 Ext. 256.

Sincerely,

ABB Environmental Services Inc.

Kathy Hodak
Project Manager

cc: Jeff Adams - SouthDiv
Narindar Kumar - EPA
Jim Holland - WHF PWD
Rao Angara - ABB-ES
File 7541-21

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**RESPONSE TO COMMENTS
ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

Specific Comments:

1. Page 3-5, Table 3-2: Sample WHF-22B-SS-13 needs to be included in the figure.

Response: The referenced sample will be added to Figure 3-2.

2. Page 3-14, Table 3-5: The units should be (ug/kg) instead of (mg/kg). Add the data when the samples were taken. Include 2 times average background concentrations from the 1993 sampling event to the table for comparison.

Response: The units will be changed to ug/kg and the sample collection date and background screening concentration will be added to Table 3-5.

3. Recheck the Semivolatile Organic Compounds to see if they pass the CPC criteria. If they do, include them in the Risk Assessment.

Response: The SVOCs will be checked with respect to the CPC criteria.

4. Page 3-20, Table 3-8: The MCL for lead is 15 (ug/l) not 315 (ug/l).

Response: The MCL for lead will be changed to 15 ug/l.

5. Page 4-2, 1st paragraph: If burning occurred, wouldn't PAHs be expected?

Response: Yes. The paragraph will be revised to indicate that PAHs would also be expected to be a site contaminant.

SOUTHERN DIVISION, NAVFACENGCOM

1. Page 2-4. Do we need to confirm the absence of contamination related to the fire training exercises?

Response: No. No risk has been identified other than exposure to lead in surface soil.

2. Page 3-3. Do we care if lead is above CRDLs? If they are below regulatory limits we are ok.

Response: No. As you indicated, if concentrations are below regulatory limits there is little concern.

3. Page 3-8. The R's are not explained in the legend of the table.

Response: The table will be revised to explain R as rejected data.

4. Page 4-1. Why couldn't the risk associated with the lead be quantified?

Response: Lead does not have a cancer slope factor which is needed to calculate the risk.

5. Page 6-1. Do we need to state the lead level that needs to be remediated? The SERE stated that below 780mg/kg was ok for ecological risks.

Response: No. Although the ecological risk assessment identified 780mg/kg as an exposure concentration for lead in soil, the residential scenario lead concentration in soil is 400 ppm. Risk management decisions will have to be made to determine the target cleanup level based on current exposure pathways and future use of the site. This decision will be made at a future date and it is not necessary to present the clean-up level in the decision document.