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NAS WHITING FIELD
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT REMEDIAL
INVESTIGATION FEASIBILITY STUDY WORK PLAN NAS WHITING FIELD FL
12/29/1989
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
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DEC 29 1989

4WD-SISB

Mr. Ted Campbell
Southern Division
NAVFAC-ENCOM
2155 Eagle Drive
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Charleston, S.C. 29411-0068

Re: EPA comments on the Draft RI/FS Work Plan for NAS Whiting Field, Milton, FL

Dear Mr. Campbell,

EPA has reviewed three (3) volumes submitted as an RI/FS Work Plan and which includes the Sampling and Analysis Plan and Health and Safety Plan. We have the following comments on these plans:

RI/FS Work Plan

1. Page 4, Section 1.2, If Whiting Field is placed on the NPL, RODs must be done for any sites requiring long term monitoring. Long term monitoring is not considered No Further Action by the Agency.
2. Page 40, Section 2.4.1, Since Site 2 is listed in Table 2-15 and mentioned in the text as not being recommended for further study, EPA recommends sufficient cause for such determination also be provided in the Work Plan. The Work Plan is after all a public document. Also sludges are not petroleum products and can be covered under CERCLA. Do not eliminate these sites from consideration.
3. Page 42, Section 3.0, Use the following EPA guidance in doing Risk Assessments at Whiting Field:
 - Superfund Public Health Evaluation Manual (June 1989)
 - Risk Assessment Guidance for Superfund-Environmental Evaluation Manual (March 1989).
4. Page 49, Section 3.1.1.5, Federal Drinking Water Standards apply if Florida's are less stringent. The following are Federal MCLs proposed in August 1988.

Lead - 5ppb
Lindane - 0.2 ppb



5. Table 3-7, The Safe Drinking Water Act does not contain MCLs. They are specified in the National Primary Drinking Water Regulations.

6. Pages 79-82, Table 3-12, Samples should be at a minimum analyzed for the Target Compound List.

7. Page 87, Section 5.3, Prior to implementation of Phase II the Work Plan must be amended for Phase II and reviewed and approved by EPA.

8. Page 87, Section 5.3.1, It is unclear from your discussions if the upper or lower portion of the lower zone aquifer will be monitored. Please clarify.

9. Page 91, Section 5.3.1.2, EPA doesn't use or accept laboratory permeability data as field conditions. EPA requires field data. Either an adequate number of slug tests to establish variability or pump tests, must be performed.

10. Page 91, Section 5.3.1.2, PVC should be used only for monitoring wells constructed for screening purposes. Suitability of these wells for future use in accurately quantifying waste constituents will have to be evaluated on a case-by-case basis and some data may not be accepted by EPA if the well is believed to be compromised due to its construction material.

11. Page 91, Section 5.3.1.2, Bentonite pellets should be tremied in order to prevent bridging. Surface pads should be 3 feet by 3 feet by 4 inches in size and sloped to promote run-off away from the well.

12. Page 92-93, Table 5-2 and 5-3, Why is a bentonite pellet seal not proposed for the double cased well? A seal keeps cement out of your sand pack and consequent contamination.

13. Page 94, Section 5.3.1, Table 3-1 shows contamination already present in the lower aquifer zone, so even if confined conditions exist, it is obviously no barrier to contaminant migration. Please note this if you intend to make this type of argument in the future.

14. Page 97, Section 5.3.1.3, Why are only VOCs being analyzed for in-situ sampling?

15. Page 98, Section 5.3.1.5, WHF 5-5 and WHF 5-6 are not marked on figure 5-4 as indicated in the text. Please include these locations. How were recovery times of four days and a pump test length of fourteen days determined.



16. Page 99, Section 5.3.1.5, Models need to be field verified.

17. Page 111, Figure 5-8, CPT explorations are not marked on the map. Please indicate where they will be placed.

18. Page 123. Section 5.3.3.6, EPA toxicity is a test which is meant only to determine whether a solid waste is a characteristic waste under RCRA. The test has no bearing on whether a substance is hazardous. Sludge is not petroleum and is therefor not exempted from CERCLA. This site should be included in the Work Plan.

19. Page 133, Section 5.3.3.9, There is no need to separate these sites out. They could be considered one operable unit and if Whiting Field is placed on the NPL a single ROD could be written. It is not necessary to single out each individual site for a separate action.

20. Page 142, Section 5.3.3.9, At most of the sites at Whiting Field, the source area is not being characterized. Is it fully understood what wastes were disposed at each site and the volume of that waste, so that there is adequate information if the source itself needs remediation.

21. Page 154, Section 5.3.4, It is a good idea to separate out facility wide groundwater contamination and surface water/sediment contamination. These can be addressed as separate operable units if RODs are required in the future.

22. Page 156, Figure 5-21, Why are no samples being taken from the ditches which feed into Coldwater and Clear Creeks? Why is Clear Creek not being sampled downstream of the two southernmost ditches draining Whiting Field?

23. Page 162, Section 5.3.5.1, Once the groundwater direction is determined and contaminants of concern and their degradation products determined, monitoring wells may need to be placed to delineate any possible offsite contaminant migration. If contaminants have moved offbase then domestic wells will need to not only be identified but sampled as well.

24. Page 166, Section 5.3.5.2, Well construction is not consistent with the Sampling and Analysis Plan. Bentonite seals are missing. Long term monitoring wells need protective measures in heavy traffic or mowed areas.

25. Page 167, Section 5.3.5.4, Instead of drilling through a landfill, a backhoe could be used.



26. Page 172, Section 5.6.2.2, EPA suggests presenting in table form information for the selection of contaminants of concern. The following should be included: 1) all detections of contaminants, the frequency of "hits", the mean concentration, the maximum concentration and the 95% confidence limit level. The rationale for eliminating chemicals from the indicator chemical list should be included in the table.

27. Page 173, When identifying health-based numbers, as part of the ARARs discussion, EPA's Integrated Risk Information System (IRIS) should be the primary source of information. The reference doses and cancer potency factors in IRIS are continually updated as new information becomes available. Thus, IRIS should be rechecked as closely as possible to the time of submission of any risk assessment document and the risk calculations adjusted accordingly.

28. Page 192, Figure 6-2, EPA's national policy is to complete the RI/FS in 18 to 24 months. The twenty-nine (29) months until a final report is submitted to EPA is breaking with this national policy. However Whiting Field is not on the NPL nor is there a Federal Facility Agreement in place. Therefore an operation schedule for the facility is at the Navy's discretion.

Sampling and Analysis Plan

29. Page 43, Section 3.1.12, Appendix A, EPA recommends that calibrations be performed for all appropriate instruments at the end of each day to document that each instrument continued to function properly throughout the day. This also provides personnel adequate time to make repairs or adjustments, as necessary to the equipment before the next time it is used.

30. Page 65, Section 3.4.6, Appendix A, Procedures for well development should include: 1) waiting time between grout placement and development; 2) special precautions for the particular method that might be chosen; and 3) criteria for determining when development is complete.

31. Page 24, Section 6.3, Appendix B, The decontamination procedures specified for sampling and drilling equipment are not adequate. The following procedure should be used to clean all sample contacting equipment, including drill rod, auger flights, split-spoons, hand augers, etc.:

1. Clean with tap water and laboratory grade detergent, using a brush if necessary, to remove particulate matter and surface films. Steam cleaning may be necessary to remove matter that is difficult to remove with a brush. If the contamination consist of stubborn oils or tarry organics, it may be necessary to pre-clean with a strong solvent, such as acetone or hexane, prior to the detergent wash step.

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2. Rinse thoroughly with tap water.
 3. Rinse thoroughly with deionized water.
 4. Rinse twice with solvent (pesticide-grade isopropanol).
 5. Rinse thoroughly with organic-free water and allow to air dry as long as possible. If organic-free water is not available, allow the equipment to air dry as long as possible. Do not rinse with deionized or distilled water.

Note: Organic free water can be processed on site by purchasing or leasing a mobile deionization organic filtration system.

Note: Tap water may be applied with a pump sprayer. All other decontamination liquids (D.I. water, organic-free water, and solvents), however, must be applied using non-interfering containers. These containers will be made of glass, Teflon, or stainless steel. No plastic containers or pump sprayers are allowed.

Note: Well casing and screen, as well as tremie pipe, shall be cleaned according to these procedures. Prior to cleaning, however, it may be necessary to sand off printing inks, if present, on these materials. If any of these materials are of PVC construction, the solvent rinse step should be omitted.

6. Wrap with Aluminum foil, if appropriate, to prevent contamination if equipment is going to be stored or transported. Clean plastic can be used to wrap augers, drill rods, casings, etc., if they have been air dried.
7. As previously stated, all downhole augering, drilling and sampling equipment shall be sandblasted before Step #1 if there is a buildup of rust, hard or caked matter and/or painted equipment. All sandblasting shall be performed prior to arrival on site.

32. Page 31, Section 6.6.2, After removal of the VOA sample, the remaining soil should be thoroughly mixed before the other containers are filled.

33. Page 40, Section 6.6.3, EPA finds mixing on plastic or butcher paper unacceptable. A large, properly decontaminated glass pan should be used.



34. Page 49, Section 6.7.2.1, EPA recommends washing the indicator probe and wetted portion of the cord with laboratory grade detergent and rinsing with D.I. water between wells. Stubborn films may require brushing during the detergent washing step.

35. Page 49, Section 6.7.2.2, EPA recommends that all wells be purged and sampled by pumping or bailing from the top of the water column. If dense, immiscible phases are known or suspected, additional sampling should be conducted from the lower portion of the screened portion of the well to better characterize or quantify those constituents.

36. Section 6, See enclosed memo from EPA Region IV Environmental Services Division.

37. Section 6, Figure 6-6, Region IV policy is not to filter samples for metals analyses.

If EPA can be of further assistance, please contact Ms. Nancy Dean at (404) 347-5059.

Sincerely yours,

for
H. Kirk Lucius, Chief
Site Investigation and Support Branch
Waste Management Division

cc: Eric Nuzie, FDER