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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
10/31/1989
U S EPA REGION IV



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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Interoffice Memorandum

TO: Eric Nuzie, Federal Facilities Coordinator, Bureau of Waste Cleanup

FROM: Jim Crane, Bureau of Waste Cleanup *JJC*

DATE: October 31, 1989

SUBJECT: Remedial Investigation/Feasibility Study Work Plan, Final Draft, Naval Air Station Whiting Field, August 1989

I've reviewed the following documents:

- (1) Volume I, Work Plan
- (2) Volume II, Sampling and Analysis Plan
- (3) Volume III, Data Management Plan
- (4) Volume IV, Health and Safety Plan

I've arranged my comments to follow the above order.

- (1) Work Plan

The plan proposes the use of PCPT to determine the depth to the water table and to define the groundwater flow parameters. It has been brought to my attention that in other studies this approach was not successful. If the PCPT approach does not work, a backup plan using piezometers or more monitoring wells should be proposed and implemented.

[Sections 1-4]
No Comments

[Section 5-RI/FS Tasks]
Site-Specific Explorations-Site 1 (Northwest Disposal Area)

Since the site received a large variety of wastes over a 22 year period, the monitoring well installed previously was probably not down-gradient, and the groundwater flow direction has not been defined, it seems that the recommended tasks should be expanded to include several other items.



On a site as large as Site 1, at least 3 PCPT/in situ groundwater sampling locations should be included. Sites 17 and 18 are much too far away to provide other than a regional flow direction. The scale on Figure 5-6 makes the site appear much smaller than it really is.

Also, due to the variety of wastes placed in this landfill for so long, more than VOCs should be analyzed for. Most likely, the priority pollutants should be analyzed for.

[Site 3 - Underground Waste Solvent Storage Areas]

Since groundwater flow has not been accurately defined, the new monitoring well and the in-situ groundwater samples should be analyzed for priority pollutants. It would be advisable to analyze the other two monitoring wells for priority pollutants at the same time as the new well.

[Site 4 - North AVGAS Tank Sludge Disposal Area]

This site requires additional investigation. Chapter 17-770, F.A.C. procedures should be followed unless the sludge is a hazardous waste.

[Site 5 - Battery Acid Seepage Pit]

The recommendations appear to be acceptable.

[Site 6 - South Transformer Oil Disposal Area]

The program appears to be acceptable.

[Site 7 - South AVGAS Tank Sludge Disposal Area]

See Site 4 comment.

[Site 8 - AVGAS Fuel Spill Area]

See Site 4 comment.

[Sites 9 and 10 - Waste Oil Disposal Pit and Southeast Open Disposal Area (A)]

Since the sites are being combined for study and waste fuel with lead was disposed of in Site 9 along with a variety of wastes possibly including transformer oil with PCBs, pesticides and herbicides, all groundwater samples collected should be analyzed for priority pollutants.

[Sites 11,12,13,14 - Southeast Open Disposal Area (B),
Tetraethyl Lead Disposal Area,
Sanitary Landfill and Short-Term Sanitary
Landfill]



Since the sites are being combined for study and the sites contained such a variety of wastes, all groundwater samples collected should be analyzed for the priority pollutants.

[Site 15 - Southwest Landfill and Site 16 - Open Disposal and Burn Area]

A third well, WHF-16-2, is proposed. The well previously installed, WHF-16-1, is installed to 42 feet, although the groundwater table was at 11 feet. The other well previously installed, WHF-15-1, is installed to 72 feet, although the groundwater table was at 27 feet. It is not known at what depths these wells are screened. They may be inadequate to determine the water quality in the shallow aquifer. Additional wells or in-situ sampling may be necessary to define the groundwater flow at different depths since it appears that the present wells are finished in the deeper zone only. Another groundwater sampling location should be established northeast of Site 15. All groundwater samples collected should be analyzed for priority pollutants.

[Sites 17 and 18 - Crash Crew Training Areas]

These sites seem to be rather far apart to be combined. Each site should have at least three wells or groundwater sampling locations around the site. Groundwater samples should be analyzed for volatile organics, base neutrals including the PAHs, and metals.

(2) Sampling and Analysis Plan - Site Management Plan

No Comments.

(2) Sampling and Analysis Plan - Field Sampling Plan

For comments on the Site-Specific Explorations Section, see the Work Plan comments provided for the Site-Specific Explorations Section of the Work Plan.

(3) Data Management Plan

No comments

(4) Health and Safety Plan

No comments

JC/rv

