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NAS WHITING FIELD
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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON INITIAL ASSESSMENT
STUDY NAS WHITING FIELD FL
8/14/1985
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

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TO: Eric Nuzie
THROUGH: John Gentry *JG*
FROM: James Crane *JCE*
DATE: August 14, 1985
SUBJECT: Initial Assessment Study, Naval Air Station (NAS)
Whiting Field, Milton - Review and Comments

I have reviewed the subject document. The purpose of an IAS is to identify and assess sites posing a potential threat to human health or the environment due to contamination from past hazardous materials. This report identified 16 sites and recommended 15 sites for confirmation studies. The site not recommended for further study was an area used for disposal of construction and demolition debris.

This report recommended sampling locations and testing parameters for each of the 15 sites which will be investigated in the confirmation stage. I have concerns with the testing parameters that are stated as being site-specific. I do not believe that the Navy or the consultants know with much certainty the identity of the wastes that were disposed of in the open disposal areas and landfills (Sites 1, 10, 11, 13, 14, 15, 16). The list of indicator testing parameters (Table 3-2) are constituent-specific and are not indicative of a great variety of other constituents that may have been deposited in the sites, e.g. benzene, trichloroethylene, etc. The initial set of samples, analyzed for from each of these sites, should be tested for the EPA Priority Pollutants as well as the few non-Priority Pollutants listed in Table 3-2 of this report. Later analyses of the wells can be for those parameters that were identified in the initial screening.

Testing parameters for Site 3, Underground Waste Solvent Storage, should include, in addition to those listed, methylene chloride, MIBK, arsenic, barium, mercury, selenium, silver, and phenols; these were all listed as constituents of the sludges (Appendix B).

The sludge disposal areas (Sites 4, 7, 12) are to have soil sampling for lead. Because of the large volume of saturated sludges buried at each site, particularly 4 and 7, I believe one well should also be drilled to the water table and analyzed by EPA test method 602 for volatile aromatics and by appropriate EPA methods for lead and EDB.

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Site 8, AVGAS Fuel Spill, is to have soil sampling for lead. I have reviewed the Geraghty & Miller study which addressed this site previously. The G & M report speculated that the fuel evaporated and that the remainder was bacterially biodegraded; no data was collected. At that time I recommended at least one well to the water table which should be tested for volatile aromatic hydrocarbons (EPA Method 602), lead and EDB. Now this report cites the Geraghty & Miller speculation as fact and justification for no ground water sampling. I still recommend ground water confirmation; after all, we are talking about 25,000 gallons of AVGAS.

Site 9, Waste Fuel Disposal Pit, by virtue of the potentially large volume of waste fuel disposed of in the pit, should have one well drilled to the water table and should be tested for volatile aromatic hydrocarbons (EPA Method 602), lead and EDB.

Site 5, Battery Acid Seepage Pit, has been the object of a DER enforcement case. DER has negotiated and approved a preliminary assessment workplan by Geraghty & Miller. The workplan approved by DER should be the basis for the study done at Site 5, and should supersede the plan submitted in this report in whatever areas the two plans differ.

This report states that waste paints, thinners, solvents, waste oils and hydraulic fluids were taken to fire fighting training areas. These areas should be identified, investigated and the soils and ground water sampled using EPA Methods for metals, volatile organics, base neutrals and PCB's. The practice, as I understand it, is to dump the wastes into a pit or on the ground and to ignite the wastes for fire fighting practice.

If these preliminary activities such as confirmation studies are to be used to determine that the past practices have not caused human health or environmental problems, including violation of the State of Florida's regulations, the work needs to incorporate our concerns into the decision making in terms of which sites are to be recommended for confirmation studies, which media are to be sampled and which parameters are to be tested. I hope my comments will result in some modifications of the recommendations in this report since I have concerns about some of them.

JC/ke

cc: Bill Kellenberger