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NAS WHITING FIELD  
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LETTER REGARDING U S NAVY RESPONSES TO U S EPA REGION IV COMMENTS ON  
DRAFT REMEDIAL INVESTIGATION AND FEASIBILITY STUDY WORK PLAN NAS WHITING  
FIELD FL  
1/26/1993  
ABB ENVIRONMENTAL



January 26, 1993

Commanding Officer  
ATTN: Kim Queen, Code 1859  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
Charleston SC 29411-0068

SUBJECT: Point-by-Point Responses to USEPA Comments on Final  
Draft Remedial Investigation and Feasibility Study Workplan  
Outlying Landing Field (OLF) Barin, Foley, Alabama  
Contract Task Order No. 031  
Contract N62467-89-D-0317

Dear Kim:

Enclosed are three copies of the Point-by-Point Responses to U.S. Environmental Protection Agency review comments on the subject document. Upon approval by the USEPA, the responses will be incorporated into the RI/FS workplan. At that time all revised pages along with a revised cover will be submitted to the regulatory agencies, NAS Whiting Field, and the TRC members.

If you have any questions, please call me at 904-656-1293. We look forward to working with you on the completion of this project.

Very truly yours,

ABB ENVIRONMENTAL SERVICES INC.

  
Rao V.R. Angara  
Task Order Manager

Enclosure

cc: Gerry Walker, ABB-ES  
Jim Holland, NASWF  
Eric Blomberg, ABB-ES  
File 7541-XX (2.1)

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**RESPONSE TO COMMENTS (RI/FS Workplan)  
of  
U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)  
OUTLYING LANDING FIELD BARIN, FOLEY, ALABAMA**

Comment Number	Comment	Response
1.	In general, the map of the sites are poorly done. Maps should depict individual sites. Sampling locations should be shown with smaller symbols as the symbols presently being used often cover several square acres.	Upon initiation of the RI program all previously completed site figures will be surveyed, digitized and transferred to computer assisted drawing (CAD) system. In addition, all future drawings generated will be of the CAD source and configuration. Due to the large area of the sites, and the desire to show all relevant and important features on a single figure for the sites, the individual sampling symbols do cover a large area. However, the maps do provide specific, proposed sampling locations which may require adjustment in the field based on site conditions and features.
2.	In regards to the <u>Comparison with Background</u> paragraph on page 5-20, EPA would like to reemphasize that regional background concentrations are not acceptable. Site specific concentrations are recommended and facility specific concentrations should be used at a minimum.	Where possible, site-specific background concentrations will serve as the primary reference point of chemicals that may reasonably be attributed to the sites. At sites where individual background samples are not believed warranted, a second source for comparison will be facility-specific background concentrations. Local or regional publications which provide regional background concentrations will not be used as a primary or secondary comparison source. However, they may be used as an information source in support of the site-specific or facility-specific background concentrations.
3.	In this and all work plans , the Navy should provide a timeline-like schedule of when work is going to be accomplished and when documents will be prepared and submitted for review.	A timeline schedule will be submitted to the RPM upon finalization of the workplan.
4.	In Table 3-2 of the RI/FS Sampling and Analysis Plan, the totals for the number of monitoring wells at the water table are incorrect as to the total number of groundwater samples and the total for the number of surface soil samples. The correct totals are 19, 49, and 71, respectively.	The corrections in the totals are noted and will be changed accordingly.

**RESPONSE TO COMMENTS (RI/FS Workplan)**  
**of**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)**  
**OUTLYING LANDING FIELD BARIN, FOLEY, ALABAMA**

Comment Number	Comment	Response
5.	At Site 24B (Abandoned Firefighting Training Area), it appears that monitoring well WHF-24B-1 should be placed more northwest of the site than directly west in order to be truly up-gradient.	The groundwater flow direction at the facility was previously reported to flow in a south-southeasterly direction. However, water levels in unconfined, water table aquifers typically form a subdued replica of the topographic land surface. Based on topographic land surfaces at Site 24B and the proximity of the site to Sandy Creek, localized groundwater flow in this area is believed to have a more easterly flow component, and therefore the current, proposed location of background well WHF-24B-1 is thought to be positioned for an representative up gradient sample.
6.	Figures should be provided of each site, including Site 26B and Site 27B.	Following initiation of the RI program each of the individual project sites will be surveyed, digitized and installed to a CAD system. In future reports all figures will be formatted and generated from the CAD system. Currently both Sites 26B and 27B are shown on Figure 3-4.
7.	In regards to Site 27B, it might be advisable to immediately restrict access to this site with a fence or other impediment to trespassing and further dumping.	The facility personnel will be informed to immediately restrict access to this site.
8.	The Health and Safety Plan and Community Relations Plan are adequate and satisfactory for their purpose. All sampling and health and safety plans should follow the USEPA Region IV Standard Operating Procedures Quality Assurance Manual.	This comment is well advised and the indicated document will be a primary reference point.