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NAS KEY WEST  
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EMAIL OF TRANSMITTAL AND ADVANCED COPY OF U S NAVY RESPONSES TO FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON COMPREHENSIVE  
BACKGROUND REPORT NAS KEY WEST FL  
6/12/1997  
BROWN AND ROOT ENVIRONMENTAL

**Chuck Bryan**

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**From:** Chuck Bryan  
**To:** Jorge Caspary TAL 904/488-0190  
**Cc:** J Dudley Patrick; 'Phillip Williams'  
**Subject:** Responses to Comments - Comprehensive Background Report  
**Date:** Thursday, June 12, 1997 8:15PM  
**Priority:** High

Jorge,

At the request of Dudley Patrick, I am pleased to send you an "advance copy" of the Navy's responses to your comments. The attached file FDEP.DOC (in Word 6.0 format) contains these responses. I hope that you will find these responses acceptable. The Partnering Team meeting agenda for next week includes two hours to resolve comments on the background report. I expect that resolution of your comments will be an important part of that discussion.

I will fax a hard copy of these to you, just in case your email client software has any problems with the attached file. Please call me if you have any problems receiving the attachment.

Chuck Bryan  
Brown & Root Environmental  
(803) 649-7963 x345

<<File Attachment: FDEP.DOC>>

c: Phillip Williams, NAS Key West  
File 7046-3.2

**Response to Comments from Jorge Caspary (Florida Department of Environmental Protection)**

**Comment 1:**

The report attempts to develop background levels for a series of constituents and in doing so, goes over a vast data base dating back to 1986. Since there are questions with regard to the quality of some of the data, perhaps it would have been a better approach to utilize data that meets strict quality assurance and quality control checks. This could provide a more precise determination of background conditions at the site.

**Response 1:**

The goal of the Comprehensive Background Report was to adequately characterize background conditions in the vicinity of NAS Key West in order to support the Supplemental RFI/RI being conducted at eight NAS Key West Sites. To accomplish this goal, the Navy reviewed data dating back to 1986 to determine whether historical data could be used in the background data set. This review identified data from the 1993 RFI/RI performed by IT Corporation, the 1995 delineation sampling performed by Bechtel Environmental, Inc. and the 1996 Supplemental RFI/RI performed by Brown & Root Environmental as appropriate sources for background data points. Because the overwhelming majority of site-specific data was generated by these investigations, it is appropriate that the investigations are the source of data for characterizing background conditions. Data generated from these investigations were reviewed and validated to ensure that they meet strict quality assurance and quality control criteria as part of the investigation process. The comprehensive background report will be modified to clarify the investigatory sources for the background data set.

**Comment 2:**

The large standard deviation of some constituents may render the values unacceptable from a statistical perspective. A suggestion would be to consider the frequency of detection as a parameter designed to reduce the large deviation. Frequency of detection is widely used in Baseline Risk Assessments and its consideration in this report is highly recommended.

**Response 2:**

The Navy agrees that variability exists among the data in the background data set. This variability, however, is common in the environmental restoration industry. The Navy also agrees with the commentor's suggestion that other statistical tools are available. The Navy will utilize frequency of detection as one of the tools for comparing site-specific parameters to background concentrations in the Supplemental RFI/RI report.

**Comment 3:**

Depending on the concentration detected, unusually high numbers may be indicative of a release and not necessarily attributable to sampling and analytical errors. Please specify which constituents to does the fourth paragraph of page 2-8 is referring to.

**DRAFT**

**Response 3:**

Some of the background samples collected from the investigations performed at NAS Key West were intended to be used as background data points, but were rejected for use in the comprehensive background data set because the data contained outliers (unusually high chemical concentrations). These data points were taken out of the background data set and included in the site-specific data set. The following table lists the data points to which this situation applies:

Site	Location	Sample ID	Medium	Comments
IR 7	I7SS-10(IT)	AS1033	Sediment	Discarded due to metal and volatile organic carbon outliers
IR 7	I7MW-10	AS1018	Groundwater	Discarded due to metal outliers
IR 8	KWM-15	KWM-15	Groundwater	Discarded due to metal outliers
IR 8	KWM-15	AS1238	Groundwater	Discarded due to metal outliers
IR 8	KWM-15	KWM15	Groundwater	Discarded due to metal outliers

Section 2.1 of the comprehensive background report provides additional information regarding the process used to identify outliers and the development of the comprehensive background data set.