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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
COMMENTS ON U S NAVY RESPONSES TO COMMENTS ON RESOURCE
CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION ON HIGH PRIORITY
SITES NAS KEY WEST FL

8/25/1997

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

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Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

August 25, 1997

Mr. Dudley Patrick
Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr., P. O. Box 190010
Charleston, South Carolina 29411

RE: Responses to RFI on High Priority Sites. Naval Air
Station Key West, Florida

Dear Mr. Patrick:

I have reviewed the above referenced document dated July 1997 (received July 23, 1997). As you know, the responses have been cursorily discussed in previous NAS Key West partnering meetings and I have committed to the team to have written responses as soon as my schedule would allow it. Before the document is considered Final and the sites processed for RCRA Permit modifications/deletions, the following comments need to be discussed at our next scheduled partnering meeting.

1. Comment to Response on General Comment No. 1: I concur that comparison to the most restrictive ARAR is a conservative approach and has merit; however, I am under the impression that two different approaches were taken: one, the Risk Assessment approach which screened concentrations against already accepted background values and two, the nature and extent of contamination approach which compared values against the most restrictive ARARs. In the future, I recommend that one approach be consistently carried out through the process. My suggestion is that comparisons and potential elimination of values obtained in sampling and analysis events be performed against values that are above background as well as applicable ARARs.
2. Comment to Response on Specific Comment No. 4: the response is acceptable for this report, however, in the future I expect that a table showing the construction details for all the wells discussed and shown in the reports will be provided regardless of the company that installed them.

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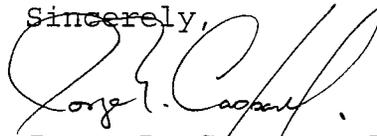
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Mr. Dudley Patrick
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3. Comment to Response on Specific Comment No. 11: the Navy should be aware that the Department will not concur on No Further Actions proposals until all the outstanding removal closure reports are delivered. Please provide a firm date for the delivery of all the outstanding closure reports.
4. Comment to response on Specific Comment No. 16: the response and explanation is acceptable only for this particular report. In the future do not average values obtained in the same location and on the same date. This is very confusing. All obtained values, without averaging, should be shown in a figure.

I look forward to discussing these comments at your convenience. In the interim, if I can be of any assistance in this matter, please contact me at 904/488-3935.

Sincerely,



Jorge R. Caspary, P.G.

cc: ~~Charles Bryan~~, Brown&Root-Aiken
Ron Demes, NAS Key West
Martha Berry, US EPA -Atlanta
Roy Hoekstra, Bechtel-Knoxville

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