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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT DATA QUALITY
OBJECTIVES FOR DEVELOPING THE BASE REALIGNMENT AND CLOSURE SITE
SCREENING WORK PLAN NAS KEY WEST FL
9/9/1997
U S EPA REGION IV

SEP 09 1997

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4WD-FFB

Mr. Dudley Patrick
Code 1852
Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr.
Charleston, S.C. 29418

SUBJ: Naval Air Station (NAS) Key West, Florida
EPA ID# FL6 170 022 952
EPA Comments

Dear Mr. Patrick:

EPA has reviewed the 8/27/97 draft Data Quality Objectives document that was prepared by Brown & Root in preparation for developing the BRAC Site Screening Work Plan and has the following comments:

1. Please explain why PCBs were not included for GRZNA-SZN7.
2. Seven samples were listed as needed for GRYNA-SZN9 and GRYNA-SZN10. I thought we had decided that, if the ponds were connected, we only needed a couple of samples - specifically from the "downstream" pond and the pond with the empty, rusting barrel.
3. Wouldn't biased sampling be more appropriate for GRYZND-SZN1? It would seem that the most likely place for a release would be around the entrances of the old battery.
4. Is GRYZNE-SZN1 the zone where contaminated construction debris was initially buried? If so, would biased sampling in the area where the material was originally buried (and later excavated and removed) be more useful than random sampling?
5. Three samples were listed as needed for GRYZNH-SZN6. Is this per pier or for both piers?
6. General - In the action level description, twice the average background level was selected as the action level for pesticides (unless the most conservative level

was higher). Please reference the EPA guidance that allows the use of 2x background for pesticides.

7. I have not yet received an answer regarding the use of SW-846 Methods 8260a and 8270b for VOCs and SVOCs. I will let you know verbally as soon as I get an answer to this question.

This concludes my comments on the DQO document. I have also reviewed that draft BRAC SI Workplan outline that was handed out at the July 1997 Partnering Meeting and I have no comments on the document.

If you have any questions, please contact me at 404/562-8533.

Sincerely,

Martha Berry
Remedial Project Manager
Federal Facilities Branch

cc: Jorge Caspary, FDEP
Ron Demes, NAS Key West
Phillip Williams, NAS Key West
Charles Bryan, Brown & Root
Roy Hoekstra, Bechtel

bcc: Frank Redmond, Federal Facilities Coordinator