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NAS KEY WEST
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LETTER REGARDING REMEDIAL ACTION PLAN RESPONSES TO REGULATOR
COMMENTS AT BUILDING 103 NAS KEY WEST FL
1/26/1995
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 26, 1995

Mr. Gabriel Magwood
Southern Division
Naval Facilities Engineering Command
2155 Eagle Dr., P. O. Box 10068
Charleston, South Carolina 29411-0068

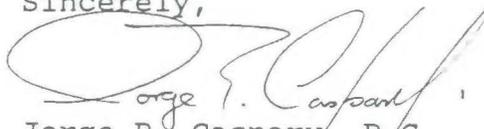
RE: Remedial Action Plan Responses, Electric Power Plant,
Building 103, Naval Air Station Key West, Florida

Dear Mr. Magwood:

Department personnel have reviewed the above referenced responses dated January 6, 1995 (received January 9, 1995). Attached you will find our comments. The responses to our observations should be addressed as part of a RAP Addendum.

If I can be of any assistance in this matter, please contact me at 904/488-3935.

Sincerely,


Jorge R. Caspary, P.G.
Remedial Project Manager

cc: Bill Carlye, NAS Key West
Mark Diblin, ABB-Tallahassee

TJB R JJC JJC ESN ESN

Memorandum

Florida Department of Environmental Protection

TO: Jorge Caspary, P.G., Remedial Project Manager,
Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section ^B

FROM: Greg Brown, Professional Engineer II, Technical Review ^B
Section

DATE: January 20, 1995

SUBJECT: Navy Response (January 6, 1995) to Department Comments
(October 26, 1994); Remedial Action Plan, Electric
Power Plant, Building 103, Naval Air Station, Key West

I have reviewed the Navy's responses dated January 6, 1995 (received January 9, 1995) to the Department's comments on the subject document and I have the following observations.

Responses to comments 1, 2, and 3 are acceptable.

Response to comment 4 is acceptable with the following qualifications. Questions remain as to the bulkhead's impermeability. Item 2 of the Department's letter dated July 25, 1994, has not been adequately addressed. Item 2c of the subsequent memorandum dated August 4, 1994, provided by the Navy's consultant, has not been adequately addressed. Without credible evidence showing that the bulkhead is impermeable, groundwater transport still exists as a potential migration pathway to surface water.

The Navy's response did provide an analysis of contamination fate and transport using a simple model, site-specific data, and literature values. Their simple analysis indicates present groundwater contamination migration to surface water is likely to be minimal and thus does not presently pose a threat to human health or the environment. This simple analysis supports the judgment that active remediation of groundwater is not necessary at this time. The Department is also thankful for the additional information provided by the Navy on the storm drains.

Response to Comment 6 is inadequate. How will the recovered water and LNAPL be treated, properly disposed of, and by whom? If specifics are not known, then the Navy should state the general standards that will be followed. For example, one may pose "Contaminated groundwater will be treated on-site by granular activated carbon and discharged to the sanitary sewer. Spent GAC will be regenerated by a qualified carbon vendor.

MEMORANDUM
Jorge Caspary, P.G.
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LNAPL will be managed by a licensed petroleum recycling agent or as a hazardous waste depending on its characterization. The quantities and disposition of treated groundwater and LNAPL will be recorded by Navy personnel responsible for waste management or by their authorized representatives."

Response to Comment 7 is inadequate. The Navy has not provided credible evidence showing that the bulkhead is impermeable. Credible evidence would be a competent assessment of the site specific construction of the bulkhead and its impact on site hydrology. As an alternative, they have provided an analysis using a simple fate and transport model indicating that groundwater contamination migrating to surface water is minimal. The Department cannot make a No Further Action finding when fate and transport models are used for predictive analysis. The Navy will need to monitor the site. Once again, if the Navy can provide credible evidence that the bulkhead is impermeable and will remain so, a No Further Action finding may be feasible (e.g., comply with the direction given in Item 2 of the Department's letter dated July 25, 1994, and Item 2c of the subsequent memorandum dated August 4, 1994, provided by the Navy's consultant).

The Navy has two choices to achieve RAP approval. They can revise the RAP to include the clarifying information provided in their approved responses, and they can provide credible evidence showing that the bulkhead is impermeable and will remain so for the foreseeable future. A No Further Action finding could then be justified after the contaminated soil and free-product are adequately removed.

The second choice is to revise the RAP to include the clarifying information provided in their approved responses, the fate and transport model, and a monitoring program in accordance with Department rules and guidance. A Monitoring Only finding could then be made after the contaminated soil and free-product are adequately removed. The Navy is still encouraged to implement the soil and free-product removal as soon as possible as an IRA. They do not need RAP approval to implement these removal actions.

Please remind the Navy that their design engineers should be sure to sign and seal their RAPs before submitting them to the Department.